

1000 Brickell Ave, Ste 1020 Miami, FL 33131 dvcattorneys.com

INVOICE

Invoice # 1190 Date: 09/30/2024

Securities and Exchange Commission 950 East Paces Ferry Road, NE, Suite 900 Atlanta, GA 30326

KDM04414

SEC v. Drive Planning, LLC and Russell Todd Burkhalter et al.

Professional Fees

Date	Description	Staff	Hours	Rate	Discount	Amount
08/13/2024	[Asset Analysis and Recovery]: Review and analyze Complaint and order appointing Receiver (0.8); call with Receiver, Local Counsel, and Forensic Accountant regarding initial planning, appearances, strategy, and (0.5); call with Receiver regarding contact with Defendant's counsel and further planning (0.2); work on first day strategy (0.4); call with counsel for Receivership Defendant (0.5); email exchange with counsel for various parties (0.1).	RML	2.50	\$395.00	-	\$987.50
08/13/2024	[Asset Analysis and Recovery]: Review, analysis, and summary of pleadings, receivership order, memorandum in support, motion for emergency relief, and other relevant documents with summarization of same to determine asset recovery strategy (4.0); telephone conference with Receiver and local counsel to discuss next steps, pending information, and develop strategy on new matter (.5); telephone conference with defense counsel for T. Burkhalter (.5); telephone call with Receiver to discuss next steps (.4).	AP	5.40	\$250.00	-	\$1,350.00
08/13/2024	[Case Administration]: Emails and telephone call with SEC counsel regarding	KDM	5.90	\$395.00	-	\$2,330.50

entry of Order Appointing Receiver and discuss same with proposed counsel and team (.2); review Complaint, Motion for Emergency Relief, Order Appointing Receiver, Preliminary Injunction, and docket, and exchange emails with SEC counsel regarding appointment, Court filings, and counsel for Defendants and counsel for Relief Defendants (2.4); discuss with team various deadlines set forth in the Order and work to be done to meet them (.2); strategize with proposed lead counsel regarding various matters to be addressed and work to be done pursuant to Order Appointing Receiver, and provide direction regarding same (1.3); telephone calls and emails with proposed forensic accountant and proposed local counsel regarding the foregoing, various work to be done to fulfill duties under Order, and administrative matters including seeking Court authority to employ professionals and procedures for pro hac vice appearances of lead counsel (1.2); coordinate preparation of motion to employ professionals and completing pro hac vice applications and emails with various proposed counsel and forensic accountant regarding same (.2); coordinate preparation of Notice of Appearance for Receiver, review and revise same, send to local counsel to finalize and file, and emails with local counsel regarding final version (.2); emails with proposed forensic accountant regarding Drive Planning's Chief Administrative Officer, call with counsel for Burkhalter, and scheduling call with accountant who analyzed assets and liabilities (.1); emails with forensic accountant and team regarding a possible IT vendor to use for forensic imaging of computers and provide input regarding same (.1)

08/13/2024

[Asset Analysis and Recovery]: Strategize with counsel and forensic accountant regarding work to be done to identify, recover, and preserve assets and obtain access to, control of, and forensically image and store all records of the Receivership Defendant and related parties, provide direction to counsel regarding same, and work on these matters with team (2.8); emails and telephone call with counsel for individual defendant regarding the foregoing matters, cooperation with the turnover and sale of various assets, certain employees and independent contractors,

KDM 4.20 \$395.00 - \$1,659.00

	business and financial records, the accounting firm utilized by company, and related matters (.8); emails with counsel for Relief Defendants regarding scheduling call to discuss the Receivership, assets, and related matters and further discuss with team (.2); coordinate performing Accurint searches on certain Defendants, review results of search, and emails with team regarding same (.3); emails with A. Pavon regarding the Yacht (.1).					
08/13/2024	[Business Operation]: Work on investigating the business operations, employees, independent contractors, managers, and principal of Drive Planning, strategize with counsel and team regarding same and preserving information from websites and social media accounts, and provide direction regarding same and related matters (2.3); discuss with C. Perez setting up receivership website and provide direction regarding same (.2).	KDM	2.50	\$395.00	-	\$987.50
08/13/2024	[Case Administration]: Review court papers for SEC enforcement action against Drive Planning and strategize with receiver and legal team.	СРМ	2.40	\$375.00	-	\$900.00
08/13/2024	[Asset Analysis and Recovery]: Review website and screen capture the team page.	LS	1.70	\$275.00	25.0%	\$350.62
08/13/2024	[Case Administration]: (No charge) Review appointment order and update calendar to reflect upcoming deadlines and requirements for the Receiver.	jas	2.10	\$100.00	100.0%	\$0.00
08/13/2024	[Asset Analysis and Recovery]: Conduct background search on defendants Jacqueline Burkhalter and Russell Todd Burkhalter for attorney review.	jas	0.70	\$100.00	25.0%	\$52.50
08/14/2024	[Asset Analysis and Recovery]: Review and analyze complaints pending against Drive Planning in New Hampshire and Pinellas County (0.3); email exchange with Marshall Glade regarding financial records of company (0.1); work on analysis of records requests and obligations in Appointment Order for cooperation (0.2); draft email to counsel representing Drive Planning in Magruder case (0.1); review and analyze email from A. Danzig regarding Embry Development Co. litigation, review and analyze provided order, and work on notification of Appointment Order (0.2); review and analyze location and details of	RML	3.90	\$395.00	-	\$1,540.50

properties for purposes of miscellaneous actions (0.2); review and revise draft Notice of Filing Complaint and Order Appointing Receiver for miscellaneous actions (0.2); call with Ceci Christy (0.5); call with Marshall Glade (0.5); confer with Receiver regarding asset recovery efforts, planning, and strategy (0.3); call with Greg Hays regarding account reconstruction requirements and planning (0.2); review and analyze email from Aaron Danzig regarding asset identification and cryptocurrency recovery, call from Mr. Danzig regarding same, and draft email response (0.3); work on request for information from Mr. Danzig (0.1); call with counsel for Julie Edwards (0.5); work on securing and inspecting company records (0.2).

08/14/2024

[Asset Analysis and Recovery]: Prepare summary of action items and pending information (.4); email exchanges with R. Landy and Receiver to discuss follow-up to defense counsel (.2); complete application for admission pro hac vice (.4); email exchange with local counsel to provide instruction on pro hac admission (.1); telephone call with offices of P. Monnin to schedule call regarding J. Edwards (.1); call with counsel for Relief Defendants Ceci Christy (0.5); call with accountant of Drive Planning Marshall Glade (0.5); in-person meeting and discussions with Receiver regarding asset recovery efforts, planning, and strategy (0.6); telephone call with C. Murena to discuss coinbase account (.1); receipt and review of documents provided by defense counsel (.1); email exchange with defense counsel providing summary of follow-up items (.1); telephone call with insurance broker to provide list of properties to determine value on same (.2); email exchanges with H. Sewell regarding various outstanding matters and status of same (.1); draft demand letter to JP Morgan Chase, American Express, and Truist (2.0); telephone call with counsel for Chief Administrator Jackie (.5); telephone call with C. Murena regarding setting up of website, research of properties, and use of third-party for claims (.3).

AP 6.20 \$250.00

- \$1,550.00

08/14/2024

[Asset Analysis and Recovery]: Work with counsel on identifying, locating, determining status of, and preserving assets and records of Drive Planning, scheduling and

KDM 8.70 \$395.00

- \$3,436.50

preparing for calls with counsel for Relief Defendants, counsel for operations manager, and accountant recently hired to assess assets and liabilities of the company, and developing strategy for fulfilling asset recovery duties under the Appointment Order (3.2); attend call with counsel for Relief Defendants to discuss assets, operations of entity Relief Defendants, knowledge of Drive Planning, and related matters (.8); emails with forensic accountants regarding upcoming call with accountant recently hired by Drive Planning (.1); telephone call with accountant regarding his assessment of assets and liabilities of the company, the status of his efforts and books and records of company, obtaining source documents, and work product, and related matters (.7): discuss with R. Landv and G. Havs information provided by that accountant and plan for reconstructing bank accounts and financial records of the company (.3); strategize and provide direction to team regarding securing, confirming status of insurance, and obtaining insurance for real properties and boat (.9); review and revise letters to financial institutions demanding turnover of accounts, production of records, and transfer of account balances to the Estate, discuss with A. Pavon, coordinate serving on institutions, review emails serving demand letter and Order, and emails with team regarding other methods of service (.5); provide direction regarding preparation of Subpoenas to financial institutions (.2); strategize with counsel regarding obtain records and sending litigation holds to various recipients of transfers from Drive Planning (.4); emails with team regarding ordering certified copies of Receivership Order to record in all counties in which real properties are located, providing input regarding confirming same and updating property list, and review updated list (.3); emails with counsel regarding office locations and need to visit, inspect and secure same (.2); emails with counsel for Burkhalter and R. Landy regarding cryptocurrencies, liquidating same, and sending proceeds to frozen account to be remitted to Estate, review documents provided by counsel regarding same, and discuss with R. Landy (.3); telephone call from counsel for Ms. Burkhalter regarding her Porsche and

agreement to sell it and give proceeds to Estate and emails with team regarding same (.2); emails with counsel for Ms. Burkhalter and Ms. Burkhalter regarding the receivership, the ranch, and related matters (.1); emails with counsel regarding draft Notice of Complaint and Order Appointing Receiver to be filed in various jurisdictions to commence Misc. Actions pursuant to 28 USC 754, review and provide input regarding same, and coordinate finalizing and filing (.3); email from forensic accountant providing information regarding certain real property and review website for same (.2).

08/14/2024

[Case Administration]: Attend hearing on SEC's Motion to compel Burkhalter to surrender passport and discuss with team the outcome of the hearing (.4); provide further direction regarding preparation of receivership website and purchasing domains for same and further discuss with C. Perez (.3); emails with counsel for Burkhalter and R. Landy regarding actions pending against Drive Planning in various jurisdictions and seeking to have those action stayed pursuant to Appointment Order, discuss with R. Landy same and replacing defense counsel for those actions, review Court filings and orders in those actions, review emails with R. Landy and counsel for plaintiffs in those actions regarding same and scheduling call to discuss, and emails with local counsel regarding appearing in GA action (.5); emails with Stretto regarding options for fiduciary accounts, discuss with M. Dhanji, and coordinate obtaining proposal from another bank (.3); multiple emails and telephone calls from and to investors regarding the SEC enforcement action, the receivership, and their involvement and losses with Drive Planning, discuss with C. Perez same and preparing notice of receivership to send to investors and summary of the case for the receivership website, and provide direction regarding same and further communications with investors (1.4); emails with team regarding creating telephone number and email address for the Receivership (.1); emails with counsel for Burkhalter regarding document production and emails with R. Landy and L. Scruggs regarding downloading and reviewing same, and provide direction regarding same (.2);

KDM 4.10 \$395.00 - \$1,619.50

KDM

0.30

discuss with counsel information and documents still needed from counsel for Burkhalter, work with counsel on preparing email to counsel requesting same, and review emails with counsel regarding same (.4); emails with local counsel confirming filing of Notices of Appearance for Receiver and local counsel and Applications to appear pro hac vice for R. Landy and A. Pavon and review same (.2); emails with Stretto regarding options for banks, the security measures that would be employed to protect funds, and the interest rates, strategize regarding same, and request additional information, and discuss with M. Dhanji same and obtaining proposal from CNB (.3).

08/14/2024 [Employment Application]: Provide further direction regarding preparation of Motion to employ professionals for the Receiver, review initial draft and provide input regarding same, emails with R. Landy regarding same, and send email to SEC counsel to confirm their position on proposed professionals.

\$395.00

\$118.50

08/14/2024 [Business Operation]: Discuss with team the shutting down of the Drive Planning website and status of preserving various webpages (.2); emails with L. Scruggs regarding her efforts to obtain webpages Drive Planning team members from other

regarding her efforts to obtain webpages for Drive Planning team members from other sources and her compiled list and review same (.2); emails with R. Landy and counsel for Burkhalter regarding same, obtaining login credentials for website, social media accounts, and other online accounts, and the consultants utilized for website and social media, and provide direction to L. Scruggs regarding contacting consultants and obtaining control of accounts (.3); emails with counsel and counsel for Chief Administrative Assistant regarding scheduling call to discuss the receivership and Receiver's duties, Drive Planning's operations, records, finances, assets, and related matters, and prepare for call (.4); prepare for call with counsel for Chief Administrative Officer and discuss with R. Land (.2); attend call with counsel for Chief Administrative Officer and my counsel and discuss with counsel various matters addressed during the call (.6); emails with R. Landy and local counsel regarding scheduling in person meeting

with Chief Administrative Office at Drive

KDM 2.80 \$395.00 - \$1,106.00

	Planning's office and provide input regarding same (.2); emails with counsel for Chief Adminstrative Officer and A. Pavon regarding passwords to computer and email and confirming meeting and discuss with team (.2); coordinate contacting IT vendor used to image laptop to obtain that image and coordinate updated imaging during upcoming meeting with Chief Administrative Officer, and emails with A. Pavon and L. Scruggs regarding same (.2); discuss with C. Perez changing the Registered Agent for the company, emails with local counsel regarding having him serve as Registered Agent, provide direction regarding same, receive confirmation regarding change, and review and coordinate payment of invoice for same (.3).					
08/14/2024	[Case Administration]: Set up Receivership website, draft content for site, set up phone lines for investors and prepare messages and respond to multiple inquiries from investors and agents.	СРМ	8.60	\$375.00	-	\$3,225.00
08/14/2024	[Asset Analysis and Recovery]: Prepare excel spreadsheet to organize location and contact information of all Drive Planning advisors and employees located on website.	LS	4.50	\$275.00	25.0%	\$928.12
08/14/2024	[Case Administration]: Prepare a Notice of Appearance of Receiver for local counsel to submit to Court.	jas	0.50	\$100.00	25.0%	\$37.50
08/14/2024	[Asset Analysis and Recovery]: Review list of properties on Preliminary Injunction Order and conduct search to determine jurisdiction of each property for purposes of filing miscellaneous actions.	jas	1.50	\$100.00	25.0%	\$112.50
08/14/2024	[Case Administration]: Prepare draft Notice of Filing Complaint and Order Appointing Receiver for attorney review for purposes of miscellaneous actions	jas	0.60	\$100.00	25.0%	\$45.00
08/14/2024	[Case Administration]: Download and organize documents produced by Drive Planning to Receiver and SEC.	jas	0.80	\$100.00	25.0%	\$60.00
08/14/2024	[Employment Application]: Draft Motion for Authorization to Employ Lead Counsel, Local Counsel, and Forensic Accountant.	AP	2.50	\$250.00	-	\$625.00
08/15/2024	[Asset Analysis and Recovery]: Call with Henry Sewell regarding securing records	RML	2.20	\$395.00	-	\$869.00

\$250.00

and electronic data (0.2); review and analyze emails from counsel for Julie Edwards (0.1); review and analyze email from A. Danzig regarding assets and records (0.1); review and revise motion for authorization to retain counsel (0.2); work on preserving and collecting company data and records (0.2); confer with Receiver regarding factual background and strategy (0.2); review and analyze company email data (0.1); confer with Receiver regarding preserving and collecting company data and records (0.2); call with Henry Sewell (0.2); calls with Receiver regarding asset recovery status and planning (0.4); review and analyze emails from A. Danzig regarding computer image recovery and formulate related strategy (0.2); review and analyze emails regarding insurance coverage on Company properties (0.1).

ΑP 08/15/2024 [Case Administration]: Receipt and review 5.30

> of multiple documents from P. Huddleston of the SEC and discussion with R. Landy and K. Murena regarding same (.2); email exchange with M. Dhanji requesting email address and phone number for receivership (.1); email exchange with M. Loomis of the SEC providing phone and e-mail for receivership (.1); introduction email exchange with J. Edwards requesting telephone call (.1). email exchange with K.

Murena regarding imaging of employee computers and imaging of same (.1); email exchange with local counsel requesting insurance broker information (.1); email exchange with local counsel sending Receiver's Motion to Employ and Proposed

passwords, and remove two-step authentication for 105 email addresses on the Drive Planning server (3.6); revisions of Motion to Employ and proposed order on same (.2); email exchange with K. Kostel regarding ADP login (.1); multiple email exchanges with Cimplifi requesting turnover

of imaged documents (.2); email exchange

Order for input on same (.2); review, reset

with Julie Bowman requesting phone call (.1); email exchange s with M. Koch providing direction on demand letter to various financial institutions (.1); email exchange with M. Glade regarding

uploading of documents (.1);

08/15/2024

[Case Administration]: Emails with SEC counsel regarding communications with **KDM** 5.80 \$395.00 \$2,291.00

- \$1,325.00

Page 9 of 166

investors and contact information for them

to use to communicate with Receiver and team and discuss with counsel (.2); emails with SEC counsel forwarding communications from investor and employee of business owned by Drive Planning, discuss with C. Perez, and coordinate responding to investors/ employee (.3); emails with SEC counsel regarding scheduling call to discuss status of initial efforts to carry out duties under Appointment Order, various assets of the Estate, Defendants' cooperation and turnover of records and information, and related matters, attend call, and discuss various issues discussed with team (.8); multiple emails and telephone calls with investors regarding their involvement with Drive Planning, losses, supporting documentation, the receivership and enforcement action, and related matters and discuss with C. Perez same, her communications with investors, further communications, and the notice to be sent to investors (2.9); email from counsel for Burkhalter providing additional documents, emails and discuss with L. Scruggs downloading, organizing and reviewing same, and provide direction regarding same (.3); prepare and circulate to team list of high priority matters to address (.2); telephone call and email from counsel for various investors, discuss with team, and schedule call to discuss the receivership and the investors (.3); email from L. Scruggs providing initial inventory of documents produced by counsel for Burkhalter and plan for imaging computers, review inventory, and provide input regarding review and organization of same (.2); emails with counsel for Burkhalter, R. Landy, and A. Pavon regarding the forensic image prepared by company hired by Burkhalter's counsel, privilege issues, developing protocol for searches, and related matters (.2); review receivership website, discuss with C. Perez, and coordinate revisions and additions (.4).

08/15/2024 [Business Operation]: Telephone call with forensic accountant regarding the status of

obtaining business and financial records, the visiting and securing of offices, and related matters (.3); review list of entities and EINs and strategize with C. Perez regarding confirming connection to and ownership by Drive Planning and receive

updates regarding investigation of same

KDM 4.40 \$395.00 - \$1,738.00

(.4); emails with team and counsel for Burkhalter regarding his Drive Planning email account, gaining access, and need to image same and provide input (.2); telephone call with R. Landy and A. Pavon confirming access to and control over company email account and coordinate changing all passwords and having all accounts imaged (.3); discuss with A. Pavon her searches of email accounts and provide input regarding same (.2); emails with forensic accountant, local counsel, and counsel for Chief Administrative Officer regarding in-person inspection of Georgia office, records and computer to be turned over, certain files gathered and to be provided, and related matters, and discuss with team (.2); discuss with R. Landy and A. Pavon our local counsel's and forensic accountant's inspection of office, initial meeting with Chief Administrative Officer of Drive Planning, turnover of 4 computers to local counsel and securing of same, and scheduling follow-up interview of Chief Administrative Officer, and strategize regarding same (.4); emails with R. Landy and counsel for Chief Administrative Officer regarding scheduling follow-up interview (.1); emails and discuss with R. Landy terminating the employment of certain employees and 1099 contractors and obtaining ADP and other payroll records and access to ADP account, and review emails with counsel for Chief Administrative Officer regarding same (.3); discuss with C. Perez her call with employee managing the St. Peterburg properties and bar regarding same and various matters related to Drive Planning's operations and strategize regarding same and scheduling call with 1099 contractor who works on the rental properties (.3); emails with C. Perez regarding that 1099 contractor and general contractor doing work on certain of the properties and discuss with C. Perez same and her upcoming call with 1099 contractor (.2); receive report from C. Perez regarding her call with 1099 contract regarding the status of the properties, renovations, and strategy for marketing them for sale and provide input regarding same (.4); email from C. Perez summarizing issues to confirm related to St. Petersburg operations and properties and strategize regarding same (.2); coordinate obtaining a new EIN for the Estate (.1); send email to forensic

accountant and financial advisor regarding tax preparation and filings for the Estate (.1); coordinate searching for primary spreadsheet used by Chief Administrative Office to manage the finances of Drive Planning and emails with team regarding same and related matters (.2); email from A. Pavon regarding spreadsheet located on computer listing properties, entities, and accounts, review same, and coordinate updating master list and investigation list (.2); email from A. Pavon confirming changing of all passwords for Drive Planning's email accounts and related matters and provide direction for dealing with one particular account (.1); emails with A. Pavon and counsel for Chief Administrative Officer regarding login credentials for ADP needed for the upcoming payroll, discuss with team, and coordinate meeting at office to retrieve credentials (.2).

08/15/2024

[Asset Analysis and Recovery]: Emails and telephone call with counsel for Relief Defendants regarding Chase's freezing of account of son of Ms. Burkhalter and confirming that Receiver and SEC did not request freezing of account, review letter to the bank and send email to counsel confirming same (.3); email from SEC counsel confirm same and communications with bank regarding account holders (.1); emails with SEC counsel and counsel for Ms. Burkhalter regarding source of funds in the account and related matters (.1); follow up on status of the banks' receipt of demand letters, compliance with demands and Receivership Order, and turnover of the accounts and balances, emails with team regarding same, and provide further direction regarding same (.3); work with A. Pavon and C. Perez on investigating real properties and review updated report regarding same (.5); emails and discuss with A. Pavon and R. Landy investigation of insurance on the properties and coordinate obtaining insurance on all real properties (.3); emails with accountant at B. Riley and team regarding his production of documents related to his analysis of assets and liabilities of Drive Planning and provide input regarding transmitting and reviewing documents and providing to forensic accountant (.3); telephone call with my forensic accountant regarding his upcoming meeting with accountant at B. Riley and

KDM 4.40 \$395.00 - \$1,738.00

strategize regarding same (.2); emails with forensic accountant regarding insurance agent and confirming that all receivership assets are insured and emails with forensic accountant and insurance agent used by Drive Planning requesting production of policies, adding Receiver as loss payee, and scheduling call, and provide input to counsel regarding same (.4); emails with team regarding commissions paid to agents/advisors and investigation of same and recovery claims and provide direction regarding same (.3); follow up on preparation of Subpoenas to bank and coordinate preparation of Subpoena to insurance agent (.2); emails and discuss with R. Landy visiting St. Petersburg to inspect the vehicles, the yacht, the properties and the bar and need for additional information regarding the same. coordinate search of records provided by Burkhalter's counsel, receive report regarding same, and prepare and send email to Burkhalter's counsel requesting information and proposing inspection of vehicles and yacht and commencing efforts to sell same (.5); emails with counsel for Burkhalter regarding vehicles and yacht and information and documents to be provided and discuss with R. Landy (.2); emails with counsel for Burkhalter regarding the property in Mexico and investment in Colombia and documents to be provided and discuss with team (.2); work with R. Landy on scheduling in-person inspection of vehicles and properties in St. Petersburg, Florida and coordinate making travel arrangements (.2); email to counsel for Defendant to arrange for inspection of vehicles, yacht, and properties and further discuss with team (.1); emails with Relief Defendant regarding rescheduling call to discuss the operations of the ranch and related matters and discuss with team (.2).

08/15/2024 [Employment Application]: Send email to **KDM** 0.60 \$395.00 \$237.00 counsel for Defendant and counsel for Relief Defendant regarding proposed Motion to employ professionals and requesting their positions on same (.1); email from counsel for Defendants confirming no objection to employment (.1); emails with counsel for Relief Defendants regarding proposed forensic accountant and local counsel and additional information regarding same (.2); email from counsel for SEC confirming consent to

	proposed employment of professionals and coordinate updating Certificate Conference to reflect that all parties consent (.1); emails with forensic accountant and local counsel regarding their input on the draft Motion to employ and coordinate finalizing and sending to local counsel to file (.1).					
08/15/2024	[Asset Analysis and Recovery]: Phone calls with American Express legal department and court order response team.	MJK	0.80	\$225.00	25.0%	\$135.00
08/15/2024	[Asset Analysis and Recovery]: Draft and send email to American Express legal department and court order response team.	MJK	0.20	\$225.00	25.0%	\$33.75
08/15/2024	[Asset Analysis and Recovery]: Phone calls with Chase bank legal department and court order response team.	MJK	0.80	\$225.00	25.0%	\$135.00
08/15/2024	[Asset Analysis and Recovery]: Draft and send email to Chase Bank legal department and court order response team.	MJK	0.20	\$225.00	25.0%	\$33.75
08/15/2024	[Asset Analysis and Recovery]: Draft and send email to Truist legal department and court order response team.	MJK	0.20	\$225.00	25.0%	\$33.75
08/15/2024	[Asset Analysis and Recovery]: Phone calls with Truist legal department and court order response team.	MJK	0.80	\$225.00	25.0%	\$135.00
08/15/2024	[Case Administration]: Respond to multiple investor inquiries by email and phone and discuss information on advisors and financial institutions provided by investors with Receiver.	СРМ	9.80	\$375.00	-	\$3,675.00
08/15/2024	[Business Operation]: Contact website and social media administrators (.2); organize, review and search documents from Drive Planning counsel (4.3); conference call with Drive Planning counsel's forensic/database company (.3).	LS	4.80	\$275.00	25.0%	\$990.00
08/15/2024	[Asset Analysis and Recovery]: Create Investor log with contact information and any information provided by investors who have contacted the Receiver via phone call or email.	jas	2.00	\$100.00	25.0%	\$150.00
08/16/2024	[Asset Analysis and Recovery]: Review and analyze emails regarding insurance coverage (0.1); work on identification and recovery of assets (0.4); email exchange with counsel for Mr. Burkhalter regarding vessel (0.1); review and analyze email from	RML	4.00	\$395.00	-	\$1,580.00

D. Johnson regarding Magruder v. Drive Planning, LLC and communication from Plaintiff's counsel in that matter (0.1); call with D. Johnson regarding Magruder case status, stipulation for substitution, and obtaining file (0.2); email exchange with D. Jonson regarding fee invoices and stipulation for substitution of counsel (0.1); work on miscellaneous case filings (0.1); review and analyze memorandum regarding meeting with Julie Edwards regarding preliminary facts and turnover of office and laptops (0.3); confer with Melissa Sontheimer (0.1); call with Kemp Greene regarding insurance coverage and ownership of properties (1.5); review and analyze insurance documents provided by Mr. Greene (0.3) review and analyze documents related to Mexican property (0.1); confer with Receiver regarding insurance coverage status, subpoenas, pending litigation, and asset identification progress and strategy (0.6).

08/16/2024

[Asset Analysis and Recovery]: Email exchange with K. Murena discussing priority items in receivership (.2); telephone call and email exchanges with K. Kostel regarding ADP login and payroll (.3); continued review of Drive Planning google drive to obtain information on additional assets, investors, and logins (.6); email exchange and in-person discussions with M. Koch to provide instruction and obtain update on turnover of various bank accounts (.2); draft, revise, and finalize subpoena to JP Morgan, American Express, and Truist (1.6); email exchange with C. Murena regarding resetting of account password (.1); email exchange with local counsel regarding list of assets (.1); email exchange with A. Danzig requesting information on real properties and other assets (.1); email exchange with Truist regarding wire return request from K. Horne (.1); continued revisions and draft of asset-list and e-mail exchange with K. Murena regarding same (.4); email exchange with A. Danzig requesting information on imaged documents in Cimplifi (.1); email exchange with local counsel regarding subpoenas to various banks (.1); email exchange with M. Koch providing instruction on bank account recovery (.1); pulling of county property appraisal details for Drive Planning properties in Georgia and Florida and

AP 5.80 \$250.00 - \$1,450.00

providing same to Receiver (1.8).

08/16/2024

[Asset Analysis and Recovery]: Emails with financial advisor and tax consultant regarding tax filing obligations of Drive Planning and the Estate, obtaining an EIN for the Estate, and related matters and review provisions of Appointment Order (.3); emails with counsel for J. Edwards and A. Pavon regarding access to ADP account to confirm payroll and discuss with team (.2); attend Teams meeting with J. Edwards, her counsel, and A. Pavon to discuss ADP and payroll issues (.3); emails and discuss with A. Pavon ADP login credentials and her review of account and provide input regarding employee and payroll issues (.2); email from Burkhalter's counsel providing email login credentials and asserting privilege and emails with team regarding same (.1); emails with A. Pavon regarding employee's attempts to use email accounts and coordinate contacting those employees to confirm their positions and duties (.2); emails with J. Burkhalter regarding the upcoming call to discuss various matters related to Georgia ranch, store, operations, and properties and discuss with team (.2); telephone call with J. Burkhalter to discuss the foregoing and related matters (.5); discuss with team various matters related to the ranch and the store to address and investigate and attending upcoming meeting of all employees and J. Burkhalter (.5); complete tax form to obtain EIN for the Estate, emails with M. Dhanji regarding same and related matters, coordinate submitting to IRS, and receive confirmation of same and timing of receiving EIN (.3); emails with A. Pavon regarding changing password to email account to grant access to employee necessary to manage properties and discuss with C. Perez (.1); emails with A. Pavon and R. Landy regarding certain employees' attempts to log in to email accounts and change passwords (.1); review detailed report from forensic account from in-person meeting with J. Edward and inspection of Georgia office, addressing issues related to accounts, employees, operations, assets, entities, and various matters to investigate, strategize regarding same, and send emails to team regarding same, updating our lists of assets, employees, and entities, and providing

direction regarding further investigations

KDM 4.30 \$395.00 \$1,698.50

(.5); emails from forensic accountant and counsel for J. Edward providing bank statements, email list, and document evidencing investment of Defendant and review same (.2); email from financial advisor to tax consultant regarding the taxrelated requirements under the Appointment Order and applicable law, review portions of Order and strategize regarding same (.3); email from L. Scruggs regarding preservation of website and new secure login credentials to access same and confirm access (.2); email with A. Pavon and counsel for Burkhalter regarding obtaining copy of image previously captured of J. Edward's computer and agreed to formulate a privilege search protocol (.1).

08/16/2024

[Case Administration]: Multiple emails and telephone calls with investors regarding the receivership, the enforcement action, their investments and losses, the advisors through which they invested, their supporting documents, and other information, and discuss with C. Perez same and her communications with various investors (1.7); provide further direction to C. Perez regarding the formal notice to be sent to all investors (.3); telephone calls with Stretto regarding receivership, need for fiduciary accounts, financial management software, and noticing services, proposed interest rate and other matters, and discuss with C. Perez (.4); work on completing application to open fiduciary account, emails with Stretto regarding same, and upload certain completed forms (.5); email from Stretto forwarding proposal and services agreement, review same and coordinate having C. Perez consider and complete (.2); telephone calls with Verita regarding need for fiduciary account, financial management software, and related matters, emails with Verita regarding account application and software license agreement, and review same (.3); telephone call from counsel for various investors and discuss with C. Perez (.2); emails with R. Landy and counsel for Drive Planning in action brought by investor in St. Petersburg regarding retain provided by Drive Planning and balance remaining, prior settlement discussions with Plaintiff, certain discovery exchanged, Notice of Filing Receivership Order, substituting in R. Landy, Stipulation for Substitution and

KDM 3.90 \$395.00 - \$1,540.50

Order approving same, and related matters, review proposed filings, and discuss with R. Landy (.3).

08/16/2024

[Asset Analysis and Recovery]: Emails with financial advisor, counsel, and insurance agent regarding list of all assets of the Estate for purposes of confirming and obtaining insurance, coordinate updating and circulating list, and provide input regarding same (.3); emails with insurance agent regarding his list of insured assets and upcoming call with team to discuss (.2); emails with counsel for Burkhalter regarding the location of the vehicles and the boat, emails with team regarding same, and coordinate updating assets list (.2); emails with R. Landy and team regarding planning for upcoming in-person inspections of the St. Petersburg properties, vehicles, and boat (.2); receive updates regarding status of banks' compliance with turnover demands and provide input regarding communications with banks and obtaining transfers of balances (.2); review updated list of assets of the Estate and strategize regarding recovering or securing same (.3); review and make final revisions to Notice of Complaint and Appointment Order for purposes of commencing Misc. Actions pursuant to 28 USC 754 and coordinate filing in various jurisdictions (.2); emails with team regarding confirm locations of various assets and individuals against which Estate may have claims for purposes of confirming federal districts in which Misc. action should be filed, provide direction regarding same, and receive updates (.3); review updated list of employees and 1099 contractors and provide direction regarding confirming locations of same (.2); email form insurance agent regarding insurance policies for various assets but not the yacht and emails with team regarding same (.2); further emails with insurance agent regarding naming Receiver as loss payee (.1); emails with insurance agent and A. Pavon regarding updated list of assets and review same (.1); email from insurance agent forwarding Notice of Cancellation of policy and deadline to pay premium for coverage of certain vehicles, review Notice, emails with team regarding investigating vehicles, and send email to J. Burkhalter requesting information regarding vehicles (.3); review

and revise Subpoenas to banks, emails and

KDM 8.50 \$395.00 - \$3,357.50

discuss with A. Pavon certain requests, coordinate sending to forensic accountant to confirm all necessary requests are included, and emails with R. Landy and A. Pavon regarding issues related to certain requests (.6); emails with forensic accountant regarding his proposed revisions to Subpoena and issues with accounts, review proposed revisions, discuss with R. Landy and A. Pavon, and coordinate finalizing and serving the Subpoenas and notice of same on the parties (.4); email from Burkhalter's counsel providing information and documents regarding condo in Mexico and condo owned by D. Bradford, review same, discuss with C. Perez, and coordinate having R. Landy contact counsel for D. Bradford regarding turnover of condo and related matters (.4): emails and discuss with C. Perez securing the condo in Mexico and locating counsel or realtor in Mexico to assist with same (.2); emails and discuss with A. Pavon and M. Koch scheduling appointment at Truist Bank to obtain compliance with turnover demand and effect the transfer of account balances to the Estate, and receive updates from M. Koch regarding status of same (.4); multiple emails with counsel for J. Edwards and A. Pavon regarding the login credentials for the Truist Bank accounts and the use and purposes of the different accounts, and upcoming call with J. Edwards to assist with account login, and further discuss with team (.3); attend Teams meeting with J. Edwards, her counsel and A. Pavon to log in to account, address account security issues, change password and contact information, confirm account balance and certain account activity, discuss credit cards issued by bank, discuss other accounts she cannot access, and related matters (.5); login to Truist Bank account to review account activity and download balance and certain statements and emails with counsel regarding same (.4); discuss with C. Perez house in Indiana in which Drive Planning has an interest and investigating same, emails with team regarding same, and provide direction regarding investigation (.3); emails with A. Pavon regarding property appraisal reports for Florida properties and review same (.3); review email from Truist Bank to J. Edwards and Burkhalter regarding certain

account activity, emails with A. Pavon regarding same and notifying Truist of Receivership Order freezing and directing turnover of accounts, and prepare and send email to Truist regarding same and providing Order and previous turnover demand letter (.4); review document regarding investment and coordinate having A. Pavon investigate same (.1); review asset list reflecting whether assets are insured based on information from insurance agent and coordinate investigating certain vehicles and properties (.2); emails with R. Landy and insurance agent regarding various insurance policies for various properties, entities, and individuals, and Certificates of Insurance naming Receiver as loss payee, review same, and coordinate updating list of policies (.3): emails with A. Pavon and Burkhalter's counsel regarding his knowledge of policies and other insurance agents and discuss with team (.1); emails with team regarding changing address of Drive Planning with all insurance companies and related matters (.1); emails with counsel regarding Drive Montana Properties and investigation of same and provide direction regarding same (.2); emails with financial advisors regarding vacant commercial building that is not insured and confirming whether it can be insured, review document regarding property, emails with counsel regarding same, and provide direction regarding investigation of same (.3); emails with counsel for Burkhalter and R. Landy regarding our upcoming visit to St. Petersburg to inspect the properties, the bar, the vehicles, and the boat and discuss with R. Landy (.2).

08/16/2024

[Employment Application]: Review and make final revisions to the Motion to Employ Professionals and proposed Order granting same and emails with local counsel regarding same, certain local rules and requirements, and related matters, discuss with team, and coordinate filing Motion (.4); emails from local counsel regarding the Court's approval of Pro Hac Vice applications for R. Landy and A. Pavon and review same (.1); email from local counsel regarding the filed Motion to employ professionals and related matters (.1).

KDM 0.60 \$395.00 - \$237.00

08/16/2024	[Asset Analysis and Recovery]: Further phone calls with Truist legal department and court order response team; reached point of contact with Business Connect team.	MJK	0.80	\$225.00	25.0%	\$135.00
08/16/2024	[Asset Analysis and Recovery]: Further phone calls with Chase Bank legal department and court order response team.	MJK	0.50	\$225.00	25.0%	\$84.37
08/16/2024	[Asset Analysis and Recovery]: Further phone calls with American Express legal department and court order response team.	MJK	0.50	\$225.00	25.0%	\$84.37
08/16/2024	[Case Administration]: Research and confirm city/county of residence for Drive Planning advisors.	MJK	2.00	\$225.00	25.0%	\$337.50
08/16/2024	[Asset Analysis and Recovery]: Telephone call with associate of Anton Viden at Truist to schedule in-person branch meeting with Receiver.	MJK	0.90	\$225.00	25.0%	\$151.87
08/16/2024	[Case Administration]: Respond to multiple investor calls and emails and gather investor information from various agents and discuss information from investors with Receiver.	СРМ	9.60	\$375.00	-	\$3,600.00
08/16/2024	[Business Operation]: Contact social media administrator (.8); document organization and inventory (.9); Email communication with website administrator regarding access to website (.5).	LS	2.20	\$275.00	25.0%	\$453.75
08/16/2024	[Asset Analysis and Recovery]: Continue to update investor log with investor information.	jas	1.90	\$100.00	25.0%	\$142.50
08/16/2024	[Asset Analysis and Recovery]: Conduct VIN searches on vehicles to determine if Drive Planning is the owner.	jas	0.90	\$100.00	25.0%	\$67.50
08/16/2024	[Case Administration]: Communicate with Clerk of Court in various districts to determine the procedure to file miscellaneous actions.	jas	0.70	\$100.00	25.0%	\$52.50
08/16/2024	[Asset Analysis and Recovery]: Prepare Miscellaneous Action for filing in the Northern District of Florida.	jas	0.50	\$100.00	25.0%	\$37.50
08/16/2024	[Employment Application]: Finalize proposed order and motion to employ.	AP	0.50	\$250.00	-	\$125.00
08/16/2024	[Case Administration]: Email exchange with K. Murena regarding master sheet Drive Planning used to track investor.	AP	0.10	\$250.00	-	\$25.00

08/16/2024	[Asset Analysis and Recovery]: Investigation/search for locations of advisors of Drive Planning.	LS	2.10	\$275.00	25.0%	\$433.12
08/17/2024	[Asset Analysis and Recovery]: Email exchange with team regarding insurance policies and payments (0.1); review and analyze information related to recovered and identified assets (0.1).	RML	0.20	\$395.00	-	\$79.00
08/17/2024	[Business Operation]: Emails with counsel for J. Edwards and A. Pavon regarding payroll information, time records and work performed by W2 and 1099 contractors, and upcoming call to further discuss same and discuss with C. Perez.	KDM	0.20	\$395.00	-	\$79.00
08/17/2024	[Asset Analysis and Recovery]: Email from J. Burkhalter regarding vehicles covered by commercial auto policy for which Notice of Cancellation was issued and certain property that is vacant or under construction and forward to counsel for further investigation of vehicles and property.	KDM	0.20	\$395.00	-	\$79.00
08/17/2024	[Case Administration]: Emails with two different counsel for various investors regarding investor claims and working with Estate to pursue same and scheduling call to discuss same (.2); further emails with one counsel for investors regarding his clients and information they have regarding assets, our communications with investors, the receivership website, email and telephone number, and investor portal being created, and proposed time for call (.2); emails from investors requesting information, forward to counsel to respond and provide requested information, and discuss with C. Perez same and recent communications with other investors (.6); work with C. Perez on preparing frequently asked questions (.6); coordinate and provide direction regarding updates to receivership website (.2); emails with tax consultant regarding the submission of SS-4 form to obtain EIN for Estate and the need to file certain tax forms with IRS as Qualified Settlement Fund (.1).	KDM	1.90	\$395.00	-	\$750.50
08/17/2024	[Asset Analysis and Recovery]: Review ownership details for St Petersburg properties and coordinate property management, continuing remodeling, review payroll and employee issues, and	СРМ	4.50	\$375.00	-	\$1,687.50

08/17/2024	[Case Administration]: Respond to investor inquiries regarding case status and receivership process by telephone and by email.	СРМ	3.80	\$375.00	-	\$1,425.00
08/17/2024	[Case Administration]: Draft email to counsel in Joseph Prieto v. Drive Planning, LLC regarding appointment and stay of litigation (0.1); draft email to opposing counsel in Magruder matter regarding stipulation for substitution of counsel and stay of litigation (0.1).	RML	0.20	\$395.00	-	\$79.00
08/18/2024	[Case Administration]: Review and analyze emails regarding computer images (0.1); review and analyze email and invoice from D. Johnson (0.1); review and analyze documents and information provided by investors (0.2).	RML	0.40	\$395.00	-	\$158.00
08/18/2024	[Asset Analysis and Recovery]: Discuss with C. Perez taking control of accounts used to pay expenses for St. Petersburg properties and related matters, emails with counsel for Burkhalter regarding same and login credentials for those accounts, and emails with A. Pavon and R. Landy regarding same (.3); further emails with Burkhalter's counsel regarding login credential for Truist accounts, attempt login, and emails with counsel to address issues with same (.3); emails and discuss with C. Perez company through which several investors submitted their investments, emails with R. Landy regarding same, and coordinate investigation of same (.4); emails and discuss with C. Perez interview of investor regarding the advisor through which she invested and various information regarding advisor's involvement and assets, review document regarding same, and emails with R. Landy regarding contacting advisor (.3); emails and discuss with C. Perez information from administrator regarding properties in St. Petersburg and related matters and emails with A. Pavon regarding same (.3); emails from J. Burkhalter regarding properties in Georgia and Indiana, and emails with team regarding investigating same and contacting individuals with further knowledge of same (.3); emails with counsel for Burkhalter regarding St. Petersburg property being rented with right to purchase and scheduling inspection of same, and emails with team regarding investigating property (.2); further emails	KDM	2.20	\$395.00	-	\$869.00

	with counsel for Burkhalter regarding logging in to Truist accounts and schedule further attempt (.1).				
08/18/2024	[Case Administration]: Emails and discuss with C. Perez certain tax issues raised by investors and coordinate addressing with tax consultant (.2); review and revise letter to all investors, coordinate sending, and emails R. Landy regarding same (.4); emails with R. Landy regarding communications with another investor and provide direction regarding same, and further discuss with C. Perez (.2); emails with R. Landy regarding invoice from counsel for Drive Planning for Tampa actions filed against company, authorizing his application of retainer funds for prereceivership work, and remittance of balance of retainer, review invoice, and coordinate same and terminating his representation of Drive Planning (.2); multiple emails from investors, discuss with C. Perez, emails with R. Landy and A. Pavon regarding responding to same, and coordinate C. Perez's response from receivership email address (.5); discuss with C. Perez revisions to make to Services Agreement with Stretto for purposes of creating investor portal and noticing services, review same provide input regarding further revisions, and review email to Stretto regarding same (.3); emails with website manager regarding updates to receivership website, review same, and discuss with C. Perez (.2); email from Burkhalter's counsel regarding imaging of email account and laptop used by Chief Administrative Officer and emails with team regarding same (.2); further emails with tax consultant regarding administrative matters and tax requirements (.1).	KDM	2.30	\$395.00	- \$908.50
08/18/2024	[Employment Application]: Discuss with C. Perez need to employ counsel in Mexico to handle taking control of and selling condo in Mexico and coordinate negotiating engagement terms and preparation of Motion to employ same (.3); coordinate preparation of Motion to employ Stretto for creation of investor portal and noticing services (.1).	KDM	0.40	\$395.00	- \$158.00
08/18/2024	[Business Operation]: Emails with R. Landy and C. Perez regarding various employees or 1099 contractors and their work for Drive Planning for purposes of upcoming payroll,	KDM	0.90	\$395.00	- \$355.50

and discuss with C. Perez same and her communications with administrator in St. Petersburg regarding those individuals (.3); emails with J. Burkhalter regarding CPA, bookkeeper, Quickbooks, and Bank accounts and login information for the ranch and store in Georgia, and emails with team regarding same (.2); email from J. Burkhalter providing login information for ADP account for the ranch and store and emails with team regarding same (.1); emails and discuss with C. Perez deposit into account of Club 201, provision in Appointment Order regarding same, and Burkhalter's use of funds and requirement to provide weekly reports, and provide direction regarding same (.2); further emails with J. Burkhalter regarding scheduling attempt to log in to the ranch's accounts and ADP account and A. Pavon's attendance at upcoming meeting with her, the ranch manager, and the venue manager (.1).

08/18/2024	[Asset Analysis and Recovery]: Review and analyze information related to real property in Indiana and information regarding Gerry Linarducci.	RML	0.20	\$395.00	-	\$79.00
08/18/2024	[Business Operation]: Review and analyze payroll information related to employees and contractors.	RML	0.10	\$395.00	-	\$39.50
08/19/2024	[Asset Analysis and Recovery]: Reviewed preliminary injunction disclosures filed by Relief Defendants in detailing control, contact information, and assets associated with Jacqueline Burkhalter and related entities (.4); continued review and analysis of multiple documents in Drive Planning Google Drive to obtain investor list, review of assets, and insurance (.5); email exchange with A. Danzig requesting telephone call and additional information (.1); draft subpoena to Payfunnels, LLC and public search into same (1.6); email exchange with K. Murena, C. Murena, and R. Landy regarding findings on Gerry Linarducci and review of investor correspondence regarding same (.2); email exchange with K. Murena, C. Murena, and R. Landy regarding findings on Gerry Linarducci and review of investor correspondence regarding same (.2); brief review of multiple documents provided by Jamie Rosfeld (.2).	AP	3.20	\$250.00	-	\$800.00

08/19/2024	[Asset Analysis and Recovery]: Review and analyze email from counsel for Jackie Burkhalter regarding assets and open issues and review and analyze Ms. Burkhalter's disclosures (0.2); work on recovery of Bradford condominium (0.1); call with Aaron Danzig regarding asset identification, insurance, and privilege assertion by Mr. Burkhalter (0.3); analyze company documents (0.3); confer with Receiver regarding asset recovery and privilege strategy (0.2); several calls with counsel for David Bradford regarding recovery of real property (0.4); return call to Kemp Greene regarding insurance records (0.2); prepare for interview with Julie Edwards (0.3); conduct interview of Julie Edwards regarding operations of company, records, employees, and other invoiced in operations (1.6); strategize and plan with Receiver for investigation and recovery of real property in St. Petersburg (2.9); work on recovery of property in Indiana (0.1); review and analyze emails from forensic accountant (0.1).	RML	6.70	\$395.00	- \$2,646.50
08/19/2024	[Asset Analysis and Recovery]: Work on taking control of and downloading records for bank accounts for Drive Planning, the Florida properties, the Georgia properties and businesses, and multiple emails with counsel for Burkhalter, J. Burkhalter, and my counsel and accountants, and review various records, and strategize regarding same (2.8); emails and telephone call with M. Koch regarding communications with Truist regarding freezing of accounts, turnover to Receiver, procedures and logistics for same, communications with legal department, and gaining full administrative access, and review letter confirming freeze and account balances (.4); emails and telephone calls with counsel for Burkhalter regarding accessing accounts used for the Florida properties through online portal, make multiple attempts to log in to accounts, review screen shot of balances in all accounts at Truist, and discuss with team (.5); forward bank statements to forensic accountants for analysis and preparation of account	KDM	8.90	\$395.00	- \$3,515.50

reconstruction and emails with forensic accountant regarding determining automatic payments from accounts to determine which to continue or cancel (.3); work on identifying and taking control of various properties and investigating

potential assets of the Estate and strategize with C. Perez and R. Landy regarding same (1.3); emails and discuss with C. Perez and R. Landy condo in name of D. Bradford and communications with his counsel regarding same and transfer to Estate, and telephone calls with counsel regarding scheduling inspection of unit and related matters (.3); work on obtaining documents reviewed by former forensic accountant for Drive Planning and emails with accountant and my forensic accountants regarding same and his meeting with that accountant to assess work done and records analyzed to determine scope of work to be done by my forensic accountant (.3); discuss with C. Perez her communications with realtor and 1099 contractor regarding all of the assets, including real estate, vehicles, and vacht in or near St. Petersburg and my upcoming inperson inspections of same, discuss R. Landy same and issues related to Burkhalter's condo, and strategize regarding the inspections and related matters (.8); review Disclosures filed by Relief Defendants and discuss with team (.4); emails with team regarding the insurance agent for the Florida properties, whether insurance will be necessary for any properties, and related matters and coordinate investigating same through realtor with knowledge of properties, vehicles and Yacht (.3); email from investor forwarding information and email regarding self-directed IRA company and strategize with team regarding same (.3); strategize with team regarding sending Subpoenas to certain third parties that had dealings with Defendants, review Subpoena, and strategize regarding same (.3); emails and discuss with counsel potential sources of recovery including advisors and assets they purchased and strategize regarding recovering same (.4); telephone call from counsel for Bank of Tampa and discuss with counsel (.2); follow up on status of service of Subpoenas to banks, review Notice to parties regarding Subpoenas and receive update regarding service on banks (.1); email from counsel for J. Burkhalter regarding her residence and name and related matters and discuss with team (.2).

08/19/2024

[Business Operation]: Emails and calls with J. Burkhalter regarding the ranch and the store, banking and operations for same, and related matters (.5); emails and

KDM 5.70 \$395.00 -

\$2,251.50

telephone calls with counsel regarding same and the meeting with J. Burkhalter, ranch manager, and venue manager regarding operations, expenses, work to be done, and related matters and provide input regarding same (.6); emails with forensic accountant regarding upcoming visit to office in Georgia to collect boxes and meet with certain former employees, his communications with landlord, status of rental payment, and related matters, provide input regarding same, and discuss with counsel (.3); emails with local counsel and A. Pavon regarding keys to file cabinet in office with passwords and discuss with team (.1); discuss with C. Perez contracts with Tampa Bay Rays, Indy car, and NetJets and cancellation of same, provide input to C. Perez, and emails with R. Landy and A. Pavon regarding same (.3): review and revise letter to Tampa Bay Rays regarding receivership and cancelling marketing agreement and forward to R. Landy for input (.3); emails with A. Pavon regarding letter to Net Jets to cancel contract and review same (.1); emails and discuss with team regarding various employees, their duties, and whether their services are necessary for purposes of upcoming payroll (.4); prepare with R. Landy and A. Pavon for and attend call with J. Edwards and her counsel to discuss various matters related to operations, employees, assets, accounts, liabilities, financial records, and related matters (1.6); emails with A. Pavon and counsel for Burkhalter regarding our requests for tax returns, discuss with team, emails with A. Pavon regarding ordering tax returns from IRS and form for same, and coordinate same (.2); email from counsel for J. Burkhalter regarding the freezing of the ranch's accounts and related matters. discuss with team, and send email to SEC counsel regarding same (.2); emails with forensic accountant, local counsel, and A. Pavon regarding the upcoming visit and inspection of the ranch and the store, contact information for the bookkeeper and accountant, and access to QuickBooks records and provide input regarding same (.3); discuss with C. Perez tax issues raised by investors include erroneous 1099s issued to them, coordinate raising issue with tax consultant, and review email to tax consultant regarding same and requesting

input (.2); multiple emails with IT vendor, counsel for Burkhalter, and A. Pavon regarding obtaining copy of image already captured by IT vendor and ensuring work product of counsel for Burkhalter is not produced to Receiver and further discuss with team same, the cost of the copy, and having updated image captured of four computers retrieved from office (.2); emails with A. Pavon regarding her call with J. Burkhalter, the ranch manager, and the venue manager, the sources revenue, expenses, upcoming events, vehicles, equipment, account issues, and various issues to be addressed and strategize regarding same (.3); email with A. Pavon and J. Burkhalter regarding list of equipment on the ranch and discuss with team (.1).

08/19/2024 **KDM** 2.50 [Case Administration]: Further emails with Stretto regarding revisions to proposed Service Agreement, and status of obtaining all information to open fiduciary account, and discuss with C. Perez (.3): multiple emails and telephone calls from investors regarding the enforcement action, receivership, their investments, and related matters and discus with C. Perez same, and her communications with investors (.8); emails with my counsel and counsel for Burkhalter regarding call to discuss images captured by IT vendor of computers and email accounts and spreadsheet listing same, review spreadsheet, and discuss with counsel (.3); emails with team regarding status of filing Misc. Actions (.1); emails with banks regarding interest rates for the proposed fiduciary accounts and discuss with team same and requirements for opening accounts (.3); review emails with counsel for plaintiff that sued Drive Planning regarding Anti-Injunction Act and emails with counsel regarding same (.2); emails with team regarding the status of preparing investors list and review the latest version of same (.2); review Order granting Motion to Employ Professionals and emails with team regarding same (.1); prepare and send update to SEC counsel regarding various matters including asset recovery efforts and administrative issues MJK

\$395.00

\$987.50

08/19/2024 [Asset Analysis and Recovery]: Telephone calls with Truist legal department; reached point of contact Mark Conger, in-house

MJK 1.50 \$225.00 25.0% \$253.12

	counsel, to assist in providing control of accounts.					
08/19/2024	[Asset Analysis and Recovery]: Work on confirming fax and mailing addresses for sending demand letter and court order to Chase and sending same, and discuss with team.	MJK	1.00	\$225.00	25.0%	\$168.75
08/19/2024	[Asset Analysis and Recovery]: Telephone call with Keila Horne to provide Truist legal department with all necessary information.	MJK	0.70	\$225.00	25.0%	\$118.12
08/19/2024	[Asset Analysis and Recovery]: Telephone call with Marc Conger from Truist.	MJK	0.50	\$225.00	25.0%	\$84.37
08/19/2024	[Case Administration]: Analyze federal court treatment of attorney-client privilege in company emails after a Receiver takes control of the records.	MJK	1.50	\$225.00	25.0%	\$253.12
08/19/2024	[Case Administration]: Document review, search and organization (.9); search for forensic company in Atlanta, GA (.3)	LS	1.20	\$275.00	25.0%	\$247.50
08/19/2024	[Asset Analysis and Recovery]: Continue to update investor chart with information provided by numerous investors as they contact the Receiver, add all investor contact information to the receivership email account.	jas	5.20	\$100.00	25.0%	\$390.00
08/19/2024	[Case Administration]: Prepare Miscellaneous Actions for filing in the Middle District of Florida, Southern District of Indiana, and District of Hawaii.	jas	1.10	\$100.00	25.0%	\$82.50
08/19/2024	[Asset Analysis and Recovery]: Continue working on evaluating St Petersburg properties, communicate with property managers for various properties, coordinate property management, continuing remodeling, review payroll and employee issues and coordinate visit for Receiver and counsel.	СРМ	5.60	\$375.00	-	\$2,100.00
08/19/2024	[Case Administration]: Communications with investors and advisors concerning case status and receivership process by phone and emails.	СРМ	2.80	\$375.00	-	\$1,050.00
08/19/2024	[Asset Analysis and Recovery]: Confer with C. Perez regarding preparation of deed of property to Receiver and follow up.	РВ	0.30	\$375.00	-	\$112.50
08/19/2024	[Business Operation]: Email exchange with J. Burkhalter regarding upcoming	AP	4.20	\$250.00	-	\$1,050.00
08/19/2024 08/19/2024 08/19/2024	[Asset Analysis and Recovery]: Continue to update investor chart with information provided by numerous investors as they contact the Receiver, add all investor contact information to the receivership email account. [Case Administration]: Prepare Miscellaneous Actions for filling in the Middle District of Florida, Southern District of Indiana, and District of Hawaii. [Asset Analysis and Recovery]: Continue working on evaluating St Petersburg properties, communicate with property managers for various properties, coordinate property management, continuing remodeling, review payroll and employee issues and coordinate visit for Receiver and counsel. [Case Administration]: Communications with investors and advisors concerning case status and receivership process by phone and emails. [Asset Analysis and Recovery]: Confer with C. Perez regarding preparation of deed of property to Receiver and follow up.	jas CPM PB	1.10 5.60 2.80	\$100.00 \$375.00 \$375.00		\$82.5 \$2,100.0 \$1,050.0

	conference regarding the farm (.1); brief review of email exchange regarding application of QSF and tax obligations (.1); email exchange with K. Murena regarding Club 201 (.1); telephone conference with J. Burkhalter and staff to discuss farm operations (1.0); telephone conference with Julie Edwards and counsel (1.6); email exchange with A. Danzig regarding tax returns (.1); email exchange with K. Kostel providing contact information for receivership (.1); email exchanges with local counsel regarding upcoming visit to farm and store in Blue Ridge (.1); email exchange with J. Burkhaster requesting list of farm equipment (.1); draft notice of cancellation and request for turnover of interest/credits to NetJets (.7); review of tax return transcript request form and email exchange with K. Murena regarding same (.2).				
08/19/2024	[Case Administration]: In-depth review of Master Private Fund Opportunities spreadsheet and discussion with C. Murena regarding same (.6); receipt and review of multiple email correspondences received from investors and obtain instruction from C. Murena regarding same (.3); telephone call with C. Murena regarding automated emails to investors (.3); telephone call with defense counsel to discuss turnover of Cimplifi documents (.4); email exchanges with counsel for Cimplifi to obtain duplicate production (.2).	АР	1.80	\$250.00	- \$450.00
08/19/2024	[Case Administration]: Review and analyze emails from Investors (0.1); review and analyze email from Kurt Davis regarding Magruder case and work on litigation strategy (0.1).	RML	0.20	\$395.00	- \$79.00
08/20/2024	[Asset Analysis and Recovery]: Review and analyze interview notes regarding operations and finances of Burkhalter Ranch and Staroulite Barn (0.2); review and analyze documents related to, and cancellation letter to NetJets (0.1); visit and inspect several St. Petersburg properties, including Drive Planning office and various real estate investments, interview Melissa Sontheimer and Julie Bowman cover with Aaron Danzig, confer with Todd Burkhalter, inspect 68 foot yacht and confer with retained captain regarding operations and insurance, confer with vendors providing service to properties owned by Drive	RML	11.30	\$395.00	- \$4,463.50

	Planning, confer with Receiver regarding same (6.5); work on identification of, and recovery of assets (1.0); analyze issues related to assertion of privileges by Burkhalter (0.2); strategize and formulate plans with Receiver regarding various properties and assets and securing same (3.3).				
08/20/2024	[Asset Analysis and Recovery]: Research into 4506-T to obtain tax records (.4); multiple email exchanges with L. Scruggs providing direction on imaging company and platform for imaged items (.3); email exchanges with counsel for Cimplifi discussing data transfer (.2); telephone call and email exchanges with J. Burkhalter discussing invoices and visit to properties (.4); email exchange with J. Serna regarding change of ownership name and ownership to Receivership Estate (.1); multiple email exchanges with counsel for Chase Bank requesting turnover of accounts and set-up of appointment for Receiver (.3); email exchange with Truist Bank to discuss turnover of accounts (.1); email exchange with Lucretia regarding imaging of website (.1); review of vendor and invoice from Quality Works and email exchange with Receiver providing summary and request for approval of same (.2); email exchange with local counsel regarding Bulkhater Ranch and surrounding properties (.1); email exchange with Net Jets regarding cancellation of contract (.1); brief review of target American IRA (.2); continued indepth review and analysis of Drive Planning LLC Google Drive and employee emails to determine assets, insurance, target lists, and investors (2.2).	AP	4.80	\$250.00	- \$1,200.00
08/20/2024	[Asset Analysis and Recovery]: Prepare for upcoming meeting with real property manager to visit, inspect, photograph, and gather information regarding all real properties and operations related to same, the vehicles, and the yacht in St. Petersburg and Gulfport, FL and strategize with R. Landy regarding same (.4); visit, inspect, photograph, and gather information regarding the foregoing, meet with Burkhalter and his counsel regarding same, insurance on foregoing assets, address various related issues with real property manager, and strategize with R. Landy	KDM	11.30	\$395.00	- \$4,463.50

regarding same (6.5); continue working on matters related to insurance for Florida assets, confirming coverage, premiums, and deadlines for next payments, and related matters (.8); multiple emails with and telephone calls to insurance agent for Florida assets and property manager for Florida properties regarding insurance policies for same and scheduling call to further discuss, review certain policies, and discuss with counsel (.3); emails with counsel for Burkhalter regarding the captain of the yacht and discuss with R. Landy his communications with same (.2); emails and telephone call with legal department of Truist Bank regarding granting me full administrative control of accounts, completing turnover and transfer of funds, opening new temporary account from which to make payroll, and related matters and discuss with team (.5); emails and discuss with team status of Chase's turning over accounts and granting administrative access and in-person meeting required for same, coordinate scheduling same, and receive confirmation of appointment (.3); review emails with Chase regarding meeting and requirements for account turnover (.1); emails with forensic accountant regarding settlement agreement in Burkhalters' divorce and assets listed in same, review agreement, and emails with counsel regarding same (.3); coordinate preparation of Notices of Lis Pendens for various properties in which Estate has an interest and discuss with C. Perez (.2); emails with counsel for investors regarding rescheduling call to discuss their claims against third parties and discuss with R. Landy (.2); emails with counsel for investors regarding their claims against third parties and scheduling call to discuss same, and discuss with R. Landy (.2); strategize with C. Perez regarding taking control of condo in third party's name and preparation of quit claim deed and provide input regarding same (.2); emails and discuss with C. Perez regarding insurance for Florida AirBnB and confirming same with J. Burkhalter and email to A. Pavon regarding same (.2); emails with team regarding investigating house in Indianapolis and provide input regarding same (.2); emails with investor regarding third party that may have aided the fraud, review documents related to same, and

emails with counsel regarding same (.4); email from forensic accountant forwarding promissory note and related information, review same, and coordinate investigating same and informing make to make future payments to Estate (.2); coordinate sending to forensic accountant documents provided by accounting firm that Drive Planning hired prior to receivership (.1).

08/20/2024

[Business Operation]: Emails with A. Pavon and forensic accountants regarding the upcoming visit to the ranch and the store. A. Pavon's meeting with the managers, and related matters (.2); emails with team regarding imaging and preserving website of Drive Planning and whether there was an investor portal and provide input regarding same (.2); emails with G. Hays regarding agreement with Tampa Bay Rays, contact person for same, evidence of payment, and sending letter to same, further discuss with team, and coordinate revision to letter cancelling agreement and addressing other matters (.4); telephone calls with A. Pavon regarding various matters related to payroll, ADP access, and accounts linked to same and provide input regarding addressing issues (.4); emails with tax consultant and C. Perez regarding 1099s issued to investors and issues related to same, review 1099s, and discuss with C. Perez (.2); emails with counsel regarding approval of letter cancelling Net Jets contract and serving same (.1); review emails with Cimplifi and A. Pavon regarding obtaining copy of forensic image captured of J. Edwards's computer, discuss with A. Pavon, and coordinate obtaining quote for same (.1); emails with J. Burkhalter and A. Pavon regarding list of Ranch equipment and searching her email account to locate same (.1); emails with L. Scruggs and counsel for Burkhalter regarding the social media consultant and communications with website manager, follow up on status of taking control of same, and review emails with social media consultant regarding turning over accounts (.2); emails from forensic accountant confirming retrieval of all records from Georgia office, locating lists with usernames and passwords, and forwarding same, review lists, and coordinate accessing DocuSign account to download documents store in account (.2); email from A. Pavon forwarding invoice for work required at the ranch, review invoice,

KDM 2.50 \$395.00 - \$987.50

	discuss with team, and approve same (.2); emails with forensic accountant regarding checks he located, whether they were deposited or void, and related matters, and review checks, and propose call to discuss same (.1); email from forensic accountant regarding certain documents retrieved from Georgia office related to properties and insurance and having them scanned and sent to our office (.1).					
08/20/2024	[Case Administration]: Emails and telephone calls from investors and discuss with C. Perez same and her communications with investors (.8); review notices of receivership sent to various investors and further discuss with C. Perez (.2); emails and telephone call with SEC counsel regarding the visit to and inspection of the various Florida assets, confirmation of insurance, issues related to production of documents and privilege, issues related to asserting interests in real properties and related matters (.5); emails with team regarding the status of filing all Misc. actions, follow up on status of confirming locations of advisors, and provide input regarding same (.2); emails and telephone calls with banks regarding interest rates for the proposed fiduciary account and discuss with C. Perez and R. Landy (.5).	KDM	2.20	\$395.00		\$869.00
08/20/2024	[Asset Disposition]: Email from broker in Georgia regarding potential buyer of certain properties in Georgia and the timing and procedures for marketing and selling same, and discuss with team (.2); discuss with C. Perez offer to purchase cattle from the ranch and strategy for selling same (.2); emails and telephone call with potential realtor for the sale of the various properties (.2); meet with property manager to discuss her potential serving as realtor for certain of the properties (.2).	KDM	0.80	\$395.00	-	\$316.00
08/20/2024	[Case Administration]: Analyze effect of a district court's stay of state court litigation and discuss with team.	MJK	0.90	\$225.00	25.0%	\$151.87
08/20/2024	[Business Operation]: Telephone call with NetJets to confirm contact information for sending notice of cancellation.	MJK	0.60	\$225.00	25.0%	\$101.25
08/20/2024	[Asset Analysis and Recovery]: Telephone call with Truist to confirm compliance with freeze order.	MJK	0.50	\$225.00	25.0%	\$84.37

08/20/2024	[Asset Analysis and Recovery]: Telephone calls with Chase Bank; reached point of contact Luis Lopez Martinez to set inperson branch meeting with Receiver.	MJK	0.80	\$225.00	25.0%	\$135.00
08/20/2024	[Case Administration]: Further analysis of federal court treatment of district court stays of state court litigation.	MJK	1.10	\$225.00	25.0%	\$185.62
08/20/2024	[Business Operation]: Communications regarding document database (1.2); communication to opposing counsel about social media administrator email information (.1)	LS	1.30	\$275.00	25.0%	\$268.12
08/20/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	6.10	\$100.00	25.0%	\$457.50
08/20/2024	[Case Administration]: (No charge) Received initial filing packet and downloaded docket entries to file.	pl	0.40	\$100.00	100.0%	\$0.00
08/20/2024	[Case Administration]: Communications with investors and advisors concerning case status and receivership process by phone and emails and prepare and send mass email to all investors and update investor logs and contact information.	СРМ	5.60	\$375.00	-	\$2,100.00
08/21/2024	[Asset Analysis and Recovery]: Review and analyze emails from Forensic Accountant regarding records recovered from Drive Planning office and the identification of assets (0.1); work on recovery of cryptocurrency funds (0.1); analyze real estate assets for recovery of such assets (0.2); review and analyze documents and status of storage facility (0.1); review and analyze insurance documents provided by K. Green (0.2); review and analyze Todd Burkhalter's disclosures required by preliminary injunction and work on related strategy (0.1); review and analyze documents and information related to Indiana properties and recovery of same (0.2); call with Jeffery Sonn regarding estate and investor claims (0.7); confer with Receiver regarding same (0.2).call with Ross Good and Shawn Good regarding investor claims and background information (0.6); review and analyze research regarding ability to stay state court cases	RML	3.30	\$395.00		\$1,303.50

	effecting receivership assets (0.1); work on recovery of assets from Mr. Bradford (0.3); confer with Receiver regarding asset recovery planning and strategy (0.2); review and revise notice of lis pendens for certain properties (0.1); review and revise payment notice demand letter to Mark Haye (0.1).				
08/21/2024	[Asset Analysis and Recovery]: Telephone call with Hayes Financial to discuss asset list and upcoming visits to properties (.3); video conference with Blue Ridge Media (1.0); receipt and review of service fees and prices of Blue Ridge Media and e-mail summary of same to Receiver (.3); receipt and review of Burkhalter's Disclosures (.1); brief review of privilege application as it related to Drive Planning employee e-mails (.3); email exchange with K. Murena regarding coinbase liquidation (.1); search and review of closing documents for G. Linarducci property (.6); discussions with K. Murena about retainer paid by Drive Planning to attorney for Defendant (.2); create excel spreadsheet of sources of recovery and organize documents for same (.7); prepare 4506-T for signature requesting multiple tax documents (.5); draft notice of lis pendis for 1673 Hardscrabble Rd, Mineral Bluff, GA (1.0); email exchange with C. Williams of Truist to discuss document production for 10,060 wires (.2); draft promissory note notice to M. Hayes with demand for payments to Receiver (.8); email exchange with S. Askue providing asset list found in Drive Planning drive (.1); email exchange with K. Greene regarding addresses and payment reminder for insurance policies (.1); receipt and review of list of advisors and e-mail exchange with K. Murena regarding same (.3).	AP	6.70	\$250.00	- \$1,675.00
08/21/2024	[Asset Analysis and Recovery]: Emails with team regarding pictures taken of various assets, including real properties, vehicles, boat, review various pictures, and coordinate organizing same (.2); emails with counsel regarding the Promissory note and notifying maker of Receivership and provide input regarding same (.2); continue working on obtaining full administrative control and access to Truist accounts and setting up temporary account from which to pay necessary expenses for properties	KDM	7.70	\$395.00	- \$3,041.50

including payroll, and emails and telephone call with legal department regarding same (.5); emails with counsel for Burkhalter regarding upcoming meeting with bank and possible need for assistance with accessing Property Solutions by Drive Planning accounts and reschedule call to obtain 2FA code needed for login (.2); further emails with team regarding upcoming meeting with Chase to complete turnover of account and gaining administrative access (.2); prepare for call with counsel for various investors to discuss asset recovery efforts and related matters and discuss with R. Landy (.3); attend call with counsel for investors regarding same (.7); prepare for and attend call with another counsel for other investors to discuss the receivership, asset recovery efforts, investors' deadlines with various individuals and entities, potential claims. and related matters, and discuss with R. Landy (.5); follow up on status of commencing Misc. Actions and recording Receivership Order in various jurisdictions, discuss with J. Serna, and receive updates regarding same and related matters (.2); emails with A. Pavon and Georgia insurance agent regarding status of updating address, payment information, and loss payee for all policies, receive update from agent regarding same and other insurance issues, and emails with R. Landy regarding same (.3); emails with Florida insurance agent and A. Pavon regarding obtaining copies of policies for all assets in Florida and propose call to further discuss (.2); emails with team regarding status of liquidation of cryptocurrencies and send email to counsel for Burkhalter regarding same (.2); emails with forensic accountant and A. Pavon regarding obtaining records for Burkhalter's cryptocurrency account, contacting Coinbase and Burkhalter's counsel for same, and strategize regarding same (.2); review Burkhalter's Disclosures filed with the Court, discuss with C. Perez, and coordinate posting those and Disclosures of Relief Defendants to receivership website (.2); emails with G. Hays and Georgia insurance agent following up on changing address and loss payee on all policies and premium deadlines, emails with R. Landy regarding same and all policies provided by agent, send email to Florida insurance agent requesting the same, and discuss

with team following up on same (.3); telephone call with counsel for Bradford regarding turning over his interests in the condos in St. Petersburg and Mexico and related issues and emails with my counsel regarding same and related matters (.5); emails with R. Landy regarding notifying investors' counsel of turnover of Bradford properties and review and revise email to counsel regarding same (.2); emails with R. Landy regarding work to be done to have Bradford's condos transferred to the Estate and sold, provide input regarding same, and review draft Quit Claim Deed (.3); emails with team regarding investigation of promissory note and sending letter to maker demanding payment under the note and addressing other matters and review draft letter (.3); emails with insurance agent regarding insurance policies for properties and vehicles for the ranch, vacant property issue, and renewal date, and emails with team regarding same (.2); review Tax **Execution Demand Notices and related** documents for certain Georgia properties, emails with G. Hays and counsel regarding same, and coordinate investigating same prior to payment of taxes (.3); emails with S. Askue information regarding Burkhalter's investment in third party, certain transfers in bank records, maturity date for investment, and contact information for third party, review document regarding investment, and emails with A. Pavon regarding same (.2); emails with team regarding documents provided by accounting firm hired by Drive Planning prior to receivership and sending same to forensic accountant (.1); review and coordinate revisions to Notice of Lis pendens to be recorded in various jurisdictions and emails with R. Landy and A. Pavon regarding same and confirming the title owners of the properties (.2); review and approve letter to maker of promissory note demanding payment and providing information regarding receivership and discuss with team (.2); emails with forensic accountant and R. Landy regarding Indiana properties, and interests in properties, investigation and inspections to be done, contacting individual associated with properties, and possible need for insurance (.2); emails with A. Pavon regarding certain documents related to Indiana property, review same, and coordinate preparing Subpoena to title

company (.2); subpoena emails with forensic accountant regarding company the Drive Planning purchased and related documents, review same, and coordinate investigation of same (.2); email from forensic accountant providing lists of real properties from company files, review same, and coordinate updating property list (.1); emails with counsel for investors regarding scheduling another call to discuss marshalling of certain assets (.1).

08/21/2024

[Business Operation]: Emails with counsel for J. Edwards and A. Pavon regarding gaining control of the DocuSign account and download various business records stored thereon and provide input regarding same (.3); follow up on status of cancelling leases for the office space, discuss with A. Pavon, and review and approve final letters being sent to landlords (.2); further emails with G. Hays regarding checks received by Drive Planning but not deposited (.1); emails with tax consultant, forensic accountant, and C. Perez regarding the notice to provide to investors on website regarding tax issues, the theft loss deducting, directing investors to their tax professionals, and related matters, and further discuss with C. Perez (.3); emails with R. Landy and A. Pavon regarding letter to landlord of St. Petersburg lease cancelling, certain information to confirm and documents to obtain, and having office emptied and contents shipped to our office (.2); emails with A. Pavon regarding cost saving measures for the ranch, continuing advertising the event space, and the various email accounts and provide direction regarding same (.2); emails with team regarding assembling list of advisor and their contact information and provide direction regarding same (.1); emails with A. Pavon regarding need to file Request for Transcript of Tax Return and review draft of same (.1); emails with counsel for J. Edwards, R. Landy, and A. Pavon regarding possible scheduling of further interviews of J. Edwards, and discuss with team (.1).

KDM 1.60 \$395.00 - \$632.00

08/21/2024

[Case Administration]: Emails with Stretto regarding revised Proposal for Services for the investor document upload portal and reduced hourly rates, review same, discuss with C. Perez (.3); emails with SEC counsel regarding signing Waiver of Service of

KDM

3.20

\$395.00

- \$1,264.00

	Summons for Drive Planning, review and complete form, and send to SEC counsel to file (.3); emails and telephone calls from investors and emails and discuss with various team members their communications with investors and updating investor list (1.1); discuss with C. Perez and J. Serna procedures and protocols for communications with investors and compiling investors list and provide input regarding same (.4); discuss with C. Perez Stretto's creation of investor portal for uploading information and related matters, and provide input regarding same (.4); review revised Services Agreement with Stretto, discuss with C. Perez, and coordinate preparation of Motion to approve same (.3); emails with counsel regarding whether it is necessary to terminate representation of former counsel for Drive Planning and seek unused retainer funds and applicable provision of the Receivership Order and provide direction regarding same (.2); emails with A. Pavon and C. Perez regarding preparation of mass email to investors, review and revise same, and coordinate sending (.2).					
08/21/2024	[Case Administration]: [Reduced time from 1.3] Further analysis of federal court treatment of district court injunctions of state court proceedings and drafting of legal memoranda of same.	MJK	1.00	\$225.00	25.0%	\$168.75
08/21/2024	[Case Administration]: Analysis of federal court treatment of attorney-client privilege in company emails in Receiver control and drafting of legal memorandum of same.	MJK	1.20	\$225.00	25.0%	\$202.50
08/21/2024	[Asset Analysis and Recovery]: Further analysis of federal court treatment of the Anti-Injunction act in receivership contexts.	MJK	0.50	\$225.00	25.0%	\$84.37
08/21/2024	[Case Administration]: Communications with team regarding investors and forensic it vendors (1.3); document review and organization (.5).	LS	1.80	\$275.00	25.0%	\$371.25
08/21/2024	[Case Administration]: Communicate with Court Clerks and Recording offices in the counties of Fannin, Fulton, Hamilton and Honolulu County to determine the procedures to record appointment order in each county.	jas	1.50	\$100.00	25.0%	\$112.50
08/21/2024	[Asset Analysis and Recovery]: Review and organize documents provided by insurance	jas	0.70	\$100.00	25.0%	\$52.50

	broker for numerous properties.					
08/21/2024	[Case Administration]: Register attorneys Russell Landy and Adriana Pavon for e- filing in NDGA.	jas	0.20	\$100.00	25.0%	\$15.00
08/21/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	3.90	\$100.00	25.0%	\$292.50
08/21/2024	[Case Administration]: Drafted Stipulation for Substitution of Counsel in state court action against Drive Planning (.2); drafted Order for Substitution of Counsel (.2).	pl	0.40	\$100.00	100.0%	\$0.00
08/21/2024	[Case Administration]: Drafted Letter to Judge regarding submission of proposed agreed order in State Court action against Drive Planning.	pl	0.20	\$100.00	100.0%	\$0.00
08/21/2024	[Asset Analysis and Recovery]: Drafted Notice of Appearance and email designation (.2); drafted Defendant's Notice of Filing Receivership Order (.2).	pl	0.40	\$100.00	100.0%	\$0.00
08/21/2024	[Asset Analysis and Recovery]: Communicate with Mexican counsel and review ownership of condo unit in Cabo (.9); and communicate with Air BnB managers to review rentals, expenses and income of condos (1.9); and communicate with property manager of 2 rental buildings regarding new tenant lease, tenant letter and broken lease and penalties (1.8).	СРМ	4.60	\$375.00	-	\$1,725.00
08/21/2024	[Asset Analysis and Recovery]: Exchange email correspondence with C. Perez regarding form of deed for transfer of condo unit to estate.	PB	0.20	\$375.00	-	\$75.00
08/21/2024	[Case Administration]: Review and analyze email from K. Davis regarding stay in Magruder case and draft response (.1); review and analyze complaint in Hanson v. Drive Planning LLC (.1).	RML	0.20	\$395.00	-	\$79.00
08/21/2024	[Business Operation]: Work on termination and vacation of office lease.	RML	0.10	\$395.00	-	\$39.50
08/21/2024	[Employment Application]: Review of order approving my application to practice pro hac vice.	AP	0.10	\$250.00	-	\$25.00

08/21/2024	[Case Administration]: Revise mass email to investors and interested parties and coordinate process for same with team (.3); prepare mass email list for message from Receiver (.9).	АР	1.20	\$250.00	- \$300.00
08/21/2024	[Business Operation]: Email exchange and telephone call with C. Murena regarding payroll (.2); gain access to Drive Planning docu-sign, review of docu-sign portal verifying contracts of investors are within, and email exchanges with K. Kostel regarding two-step authentication to access (.6); review and analysis of master private fund spreadsheet found in Drive Planning hard-drive (.2); email exchange with R. Landy and K. Murena regarding follow-up call J. Bowman (.1); email exchange with S. Askue regarding files in room adjacent to TBR Supply Store (.1); draft notice of lease termination (.5); email exchange with S. Askue regarding imaging of computers (.1); email exchange with R. Landy and K. Murena summarizing terms of contract with Blue Ridge Media Company and recommendation regarding same (.3); telephone call with S. Askue regarding upcoming farm visit (.2); email exchange with J. Burkhalter approving invoice from Quality Workx (.1).	AP	2.40	\$250.00	- \$600.00
08/22/2024	[Asset Analysis and Recovery]: Call with Receiver regarding various matters related to asset recovery.	RML	0.20	\$395.00	- \$79.00
08/22/2024	[Asset Analysis and Recovery]: Email from Chase confirming receipt of Receivership Order and intention to comply with turnover requests and emails with A. Pavon regarding same (.2); emails with Chase confirming upcoming in-person meeting to take control of account, emails with team regarding same, visit local branch of to meet with banker to confirm freezing of account and take control of accounts, address issues with bank's legal department's compliance with Order, emails and calls with counsel regarding same (1.3); emails with counsel for Burkhalter regarding liquidation of cryptocurrencies and transfer of proceeds to Estate and emails with team regarding same (.2); meet with bankers at Truist Bank branch, complete documentation to obtain full administrative control of Drive Planning and Property Solutions by Drive Planning accounts, open new accounts to which to	KDM	10.10	\$395.00	- \$3,989.50

transfer all balances, authorize transfers, create new administrative logins for all accounts, confirm access through computer and iPhone App, and multiple emails with counsel regarding same and related matters (3.1); telephone call with counsel for various investors regarding strategy for and timing of filing claims, certain assets we are recovering in the short term, and status of filing Misc. Actions in various jurisdictions and discuss with counsel (.4); receive update regarding status of confirming filing of Misc. Actions in certain jurisdictions and recording of Receivership Order in other jurisdictions and review filestamped and recorded copies (.1); work with team on confirming Districts in which all known targets are located for purposes of filing Misc. Actions pursuant to 28 USC 754, preparing Notices of Complaint and Receivership Order, and preparing packages to send out to numerous U.S. District Courts throughout the country, and emails and telephone calls with counsel regarding same (3.8); emails with Florida insurance agent regarding the properties he procured insurance policies for, obtaining proof of insurance, and having insurance companies change name, address and loss payee on those policies, emails with A. Pavon regarding following up with same and calling agent to further discuss (.3); email from A. Pavon providing report from call with insurance agent regarding policies for the properties and the bar, the liquor license, and possible other agent that procured insurance for certain of the properties and provide input regarding same (.2); email from insurance agent providing documents regarding policies for the bar and related documents, review same, and send email to insurance agent regarding my role with respect to the bar (.2); email from counsel for Bradford providing information and documents regarding the condo in Mexico and proposing the transfer of his interest therein, review documents, emails and discuss with C. Perez same and additional information needed regarding his interest, and sending email to counsel requesting same (.3).

08/22/2024

[Business Operation]: Emails with J. Burkhalter regarding various matters related to operating and maintaining the ranch and the event space and customer's

KDM 2.00 \$395.00 - \$790.00

request to cancel upcoming event and demand for refund, and the contract for that event, and discuss with counsel reviewing contract and addressing issue (.3); email from J. Burkhalter forwarding contract and invoice for cancelled event, review same, and emails with A. Pavon regarding same (.2); sign Request for Transcript of Tax Return, emails with team regarding same. and coordinate sending to IRS (.2); further emails with C. Perez and G. Hays regarding the benefit and status of preparation and circulating to investors memorandum regarding the 1099 issue and theft loss deduction and further discuss with C. Perez (.2); email from G. Hays forwarding memorandum on theft loss deduction and related matters and information from IRS regarding same, and requesting tax consultant provide input. review memo and IRS information, and discuss with C. Perez (.5); emails with team regarding upcoming in-person inspection of the ranch, the store, and the event space and provide input regarding same (.2); email from counsel for Burkhalter regarding the new account for the bar and the transfer of funds from old account to new account in name of the bar, discuss with C. Perez, and send email approving same (.1); email from G. Hays regarding inspection of the storage unit, inventory of same, pictures of promotional items store, and shelving, communications with landlord and proposal for resolving any outstanding issues and closing unit, review inventory and pictures, and provide direction regarding resolving issues and closing unit (.2); emails with G. Hays regarding review of documents provided to Drive Planning's accountant prior to receivership and payment to Tampa Bay Rays pursuant to marketing agreement and discuss with team (.1).

08/22/2024 [Case Administration]: Review and sign final version of Services Agreement with Stretto to create investors portal for uploading information and documents, discuss with C. Perez, and coordinate sending to Stretto and confirming that it is subject to Court approval (.2); emails and telephone calls from investors regarding receivership and enforcement action and their investments and losses and discuss with C. Perez same (.8); emails and discuss with C. Perez her communications

with various investors, and information

KDM 1.70 \$395.00 - \$671.50

	regarding one advisor contacting investors and strategize regarding same (.2); email from local counsel addressing various matters including service of process for action filed against Drive Planning and Burkhalter, notice of appearance to be filed for R. Landy and A. Pavon, obtaining login credentials for filings, and issues with having notices of Court filings served on me, and provide input regarding addressing issues (.3); review and revise Notice of Appearance and send to local counsel to finalize and file (.2).					
08/22/2024	[Case Administration]: Final analysis of federal court treatment of the anti-injunction act in receivership contexts and drafting of legal memoranda for same.	MJK	0.80	\$225.00	25.0%	\$135.00
08/22/2024	[Asset Analysis and Recovery]: Assist with filing of miscellaneous actions in various jurisdictions.	LS	0.90	\$275.00	25.0%	\$185.62
08/22/2024	[Asset Analysis and Recovery]: Follow up with clerk regarding status of docketing of miscellaneous filing in MDFL.	jas	0.20	\$100.00	25.0%	\$15.00
08/22/2024	[Asset Analysis and Recovery]: Assist in gathering documents for preparation of filing miscellaneous actions in numerous district courts.	jas	1.60	\$100.00	25.0%	\$120.00
08/22/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	3.10	\$100.00	25.0%	\$232.50
08/22/2024	[Asset Analysis and Recovery]: Drafted Notice of Filing Complaint- Misc Action (District of Arizona). Drafted Notice of Filing Complaint- Misc Action (Eastern District of Michigan). Drafted Notice of Filing Complaint- Misc Action (Middle District of Tennessee). Drafted Notice of Filing Complaint- Misc Action (Western District of Michigan). Drafted Notice of Filing Complaint- Misc Action (Eastern District of Tennessee). Drafted Notice of Filing Complaint- Misc Action (Western District of Tennessee).	pl	0.20	\$100.00	100.0%	\$0.00
08/22/2024	[Asset Analysis and Recovery]: (No charge) Prepared FedEx packages to ship to all District Courts in the United States with	pl	3.50	\$100.00	100.0%	\$0.00

communications to investors and investor portal and review client lists with Stretto (2.6); respond to inquiries from investors by phone and email (2.0); and work with Stretto to review investor lists and expand investor contact list (1.0). 08/22/2024 [Asset Analysis and Recovery]: Drafted a AP 3.90 \$2 Notice of Filing for the following courts for purposes of misc. actions to establish jurisdiction over assets Northern District of Georgia, Middle District of Georgia, Southern District of Georgia; Northern	75.00 - \$2,100.00
communications to investors and investor portal and review client lists with Stretto (2.6); respond to inquiries from investors by phone and email (2.0); and work with Stretto to review investor lists and expand investor contact list (1.0). 08/22/2024 [Asset Analysis and Recovery]: Drafted a AP 3.90 \$2 Notice of Filing for the following courts for purposes of misc. actions to establish jurisdiction over assets Northern District of Georgia, Middle District of Georgia, Southern District of Georgia; Northern	
Notice of Filing for the following courts for purposes of misc. actions to establish jurisdiction over assets Northern District of Georgia, Middle District of Georgia, Southern District of Georgia; Northern	E0 00
District of Indiana, Southern District of Indiana; Northern District of California, Eastern District of California, Central District of California, Southern District of California; District of New Jersey; District of Hawaii; Northern District of Alabama, Middle District of Alabama, Southern District of Alabama, Northern District of Illinois, Central District of Illinois, Southern District of Illinois; District of Maryland; District of South Carolina; Northern District of Texas, Southern District of Texas, Eastern District of Texas, Western District of Texas, District of Colorado; Eastern District of Kentucky, Western District of Kentucky; District of Massachusetts; Eastern District of North Carolina, Western District of North Carolina, Western District of North Carolina; Northern District of New York, Carolina; Northern District of New York, Southern District of New York, Western District of New York, Eastern District of Louisiana, Middle District of Louisiana; Northern District of West Virginia; District of Arizona; Eastern District of Mest Virginia; District of Arizona; Eastern District of Michigan, Western District of Tennessee, Middle District of Tennessee, Western District of Tennessee	50.00 - \$975.00
08/22/2024 [Asset Analysis and Recovery]: Review of team list in preparation of drafting notices of filing miscellaneous actions (.6); email exchange with G. Hays regarding spreadsheets from M. Glade and brief review of spreadsheets (.3); email	50.00 - \$600.00

to investors and coordinate sending of same to 2,000 plus potential investors. Business Operation]: Revise termination of lease letter.							
to investors and coordinate sending of same to 2,000 plus potential investors. 08/22/2024 [Business Operation]: Revise termination of lease letter. 08/23/2024 [Asset Analysis and Recovery]: Review and analyze Eurney v. Drive Planning Complaint and work on litigation strategy (0.2); review and analyze information related to insurance policies (0.2); review and analyze SEC's notice of continuing investigation (0.1); conference with Receivership Team regarding identification and recovery of assets, retention of professionals, employment matters, contact with investors, and other matters (1.7); review and analyze email from K. Green regarding vehicle insurance and draft email to Receiver regarding same (0.1); review and analyze condominium documents related to One St. Petersburg for transfer of property from Bradford (2); work on analysis and review of Drive Planning documents (0.2); review and analyze research regarding stay contained in Appointment Order and challenge to same from counsel for Macgruder, and draft message to Mr. Davis regarding same (0.4); draft email to counsel in Burney case regarding stay (0.1); call with potential transactional counsel regarding recovery of interest in Mexico real estate (0.2); review and analyze tax lien releases related to Burkhalter (0.1); review and analyze Embry Development action and Bukelew action complaints (0.1); review and analyze several deeds for property owned by Receivership Estate in possession of Drive Planning for identification and recovery of such real estate (0.2).		upcoming visit to Georgia properties (.1); telephone call and email exchanges with R. Roman regarding insurance policies (.2); multiple email exchanges and telephone call with Chase to discuss turnover of accounts (.7); telephone call with K. Murena regarding status of Truist, Chase,					
lease letter. (Asset Analysis and Recovery]: Review and analyze Burney v. Drive Planning Complaint and work on litigation strategy (0.2); review and analyze information related to insurance policies (0.2); review and analyze SEC's notice of continuing investigation (0.1); conference with Receivership Team regarding identification and recovery of assets, retention of professionals, employment matters, contact with investors, and other matters (1.7); review and analyze email from K. Green regarding vehicle insurance and draft email to Receiver regarding same (0.1); review and analyze condominium documents related to One St. Petersburg for transfer of property from Bradford (2); work on analysis and review of Drive Planning documents (0.2); review and analyze research regarding stay contained in Appointment Order and challenge to same from counsel for Macgruder, and draft message to Mr. Davis regarding same (0.4); draft email to counsel in Burney case regarding stay (0.1); call with potential transactional counsel regarding recovery of interest in Mexico real estate (0.2); work on strategy related to recovery of Mexican real estate (0.2); review and analyze tax lien releases related to Burkhalter (0.1); review and analyze Embry Development action and Bukelew action complaints (0.1); review and analyze several deeds for property owned by Receivership Estate in possession of Drive Planning for identification and recovery of such real estate (0.2).	08/22/2024	to investors and coordinate sending of	AP	0.60	\$250.00	-	\$150.00
analyze Burney v. Drive Planning Complaint and work on littigation strategy (0.2); review and analyze information related to insurance policies (0.2); review and analyze SEC's notice of continuing investigation (0.1); conference with Receivership Team regarding identification and recovery of assets, retention of professionals, employment matters, contact with investors, and other matters (1.7); review and analyze email from K. Green regarding vehicle insurance and draft email to Receiver regarding same (0.1); review and analyze condominium documents related to One St. Petersburg for transfer of property from Bradford (.2); work on analysis and review of Drive Planning documents (0.2); review and analyze research regarding stay contained in Appointment Order and challenge to same from counsel for Macgruder, and draft message to Mr. Davis regarding same (0.4); draft email to counsel in Burney case regarding stay (0.1); call with potential transactional counsel regarding recovery of interest in Mexico real estate (0.2); work on strategy related to recovery of Mexican real estate (0.2); review and analyze tax lien releases related to Burkhalter (0.1); review and analyze Embry Development action and Bukelew action complaints (0.1); review and analyze several deeds for property owned by Receivership Estate in possession of Drive Planning for identification and recovery of such real estate (0.2).	08/22/2024		AP	0.10	\$250.00	-	\$25.00
08/23/2024 [Asset Analysis and Recovery]: Research Ifd 0.20 \$100.00 100.0% \$0.0	08/23/2024	analyze Burney v. Drive Planning Complaint and work on litigation strategy (0.2); review and analyze information related to insurance policies (0.2); review and analyze SEC's notice of continuing investigation (0.1); conference with Receivership Team regarding identification and recovery of assets, retention of professionals, employment matters, contact with investors, and other matters (1.7); review and analyze email from K. Green regarding vehicle insurance and draft email to Receiver regarding same (0.1); review and analyze condominium documents related to One St. Petersburg for transfer of property from Bradford (.2); work on analysis and review of Drive Planning documents (0.2); review and analyze research regarding stay contained in Appointment Order and challenge to same from counsel for Macgruder, and draft message to Mr. Davis regarding same (0.4); draft email to counsel in Burney case regarding stay (0.1); call with potential transactional counsel regarding recovery of interest in Mexico real estate (0.2); work on strategy related to recovery of Mexican real estate (0.2); review and analyze tax lien releases related to Burkhalter (0.1); review and analyze Embry Development action and Bukelew action complaints (0.1); review and analyze several deeds for property owned by Receivership Estate in possession of Drive Planning for identification and recovery of such real	RML	4.00	\$395.00		\$1,580.00
property records for Unit 3104, 100 1st Ave	08/23/2024	[Asset Analysis and Recovery]: Research property records for Unit 3104, 100 1st Ave	lfd	0.20	\$100.00	100.0%	\$0.00

	N, St. Petersburg, Florida 33701.					
08/23/2024	[Asset Analysis and Recovery]: Video conference with team to discuss receivership (1.7); receipt and review of proposals for hosting services from Disco and Lexbe and multiple calls and e-mails with L. Scruggs regarding same (.5); review of Google Drive to determine employees and investors list for correspondence to same (.4).	АР	2.60	\$250.00	-	\$650.00
08/23/2024	[Asset Analysis and Recovery]: Telephone conferences with Clerk of Southern District of Texas regarding Miscellaneous action filing status (.2); telephone conference with Clerk of the Southern District of Alabama regarding miscellaneous action filing (.1); and telephone conference with Clerk of the Southern District of Illinois regarding miscellaneous action (.1).	lfd	0.40	\$100.00	100.0%	\$0.00
08/23/2024	[Case Administration]: Status Meeting with team (1.7); Document search (.2); Communications with social media contact and forensic companies (1.2).	LS	3.10	\$275.00	25.0%	\$639.37
08/23/2024	[Asset Analysis and Recovery]: Draft correspondence to clerks in Fulton, Fannin, Honolulu and Hamilton County requesting to record certified copies of the Appointment Order and prepare package.	jas	0.60	\$100.00	25.0%	\$45.00
08/23/2024	[Asset Analysis and Recovery]: Organize insurance documents for properties and vehicles that we have received from insurance agent Kemp Green for attorney review.	jas	1.10	\$100.00	25.0%	\$82.50
08/23/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	2.40	\$100.00	25.0%	\$180.00
08/23/2024	[Asset Analysis and Recovery]: Work on management issues for St Petersburg properties, payroll issues, and turnover of the Bradford condo unit.	СРМ	2.90	\$375.00	-	\$1,087.50
08/23/2024	[Case Administration]: Respond to investor inquiries by phone and email and continue updating investor log.	СРМ	3.40	\$375.00	-	\$1,275.00
08/23/2024	[Case Administration]: Emails and	KDM	4.90	\$395.00	-	\$1,935.50

telephone calls with counsel regarding various matters to be addressed during upcoming team meeting and updating To Do List for same (.3); attend team meeting to discuss various work performed and to be performed related to asset recovery and preservation, business operations, employee and tax issues, forensic accounting work, administration of the Estate, and other matters and provide direction to team regarding same and priorities of work to be done (1.7); emails with team regarding final version of Notice of Appearance for R. Landy and A. Pavon to be filed and follow up with local counsel regarding same (.1); receive confirmation of recording of Receivership Order in certain jurisdictions and follow up on others (.1); receive confirmation of filing of Misc. Actions in various jurisdictions, discuss with team, review list of all filed actions, and coordinate following up various Courts to confirm receipt of filing (.4); review and sign Notice to commence Misc. Action in N.D. Alabama to provide wet signature that will be docketed, discuss with team, and coordinate sending to Clerk (.2); review docket entry from D. Colorado regarding the opening and closing of case and discuss with J. Serna her confirmation with Clerk that case is open but will remain dormant (.2); emails with JP Morgan Chase regarding the status of turning over the account, making me sole signatory, and granting me full administrative access and scheduling a second meeting at branch to finalize same and discuss with team (.2); review two Complaints filed against Drive Planning in Georgia state court and coordinate investigating status of cases and having local counsel make appearance in each case (.4); review SEC's Notice of Ongoing Investigation and discuss with counsel (.2); review case law regarding Anti-Injunction Act for purposes of having state court action dismissed or stayed, discuss with counsel, and review emails with counsel and counsel for plaintiff in that action (.2); further emails with Cimplifi, counsel for Burkhalter, and A. Pavon regarding obtaining copy of forensic image of J. Edwards's computer and ensuring privileged work product of counsel is not provided and discuss with team (.1); emails with team regarding proposals from document management company for

purposes of storing and searching through all records of the Estate and provide direction regarding same (.2); multiple emails and telephone calls with investors regarding their investments and losses, the enforcement action, and the receivership and website and online portal being created to upload information and documents and discuss with C. Perez her recent communications with investors regarding same and related issues (.6).

08/23/2024

[Business Operation]: Multiple emails with A. Pavon and IT vendor used by Burkhalter's counsel to image J. Edwards's computer regarding status of providing copy of image and approval required by Burkhalter's counsel, emails with counsel regarding same and related matters, and further discuss with team (.3); further emails with counsel for Burkhalter regarding accounts of Club 201 and discuss with team (.1); emails and telephone call with representative of bank for one fiduciary accounts for the Estate regarding account setup and interest rate (.2); emails with counsel and forensic accountant regarding contents of storage facility including written promotional materials and preserving sample of same (.1); multiple emails and telephone calls with financial advisors regarding their inspection of the ranch, the store, and the event space and related properties, their assessment and pictures of same, and recommendations regarding preserving and marketing for sale, review pictures, and emails and discuss with counsel high priority matters to address (1.2); emails with insurance agent regarding insurance matters related to Club 201 and discuss with team (.2); emails and discuss with A. Pavon and C. Perez various payroll and ADP related issues and provide direction and account information for same (.5); emails and discuss with R. Landy and C. Perez providing written confirmation of termination of certain employees and emails with counsel for J. Edwards confirming termination and forthcoming final payroll payment (.3); emails and discuss with R. Landy and C. Perez regarding termination of handyman and the remaining work he will do through date of last pay check, review communications with handman regarding same, and provide direction regarding remaining work (.2);

KDM 3.50 \$395.00 - \$1,382.50

	multiple emails with R. Landy, A. Pavon, and J. Serna regarding completing necessary forms for termination of employees in Georgia, review form, and provide input (.2); telephone call and emails with counsel for Bank of Tampa regarding the scope of the receivership and the proposed closing of account of Club 201 and transfer of account balance to new account at new bank, and discuss with team same and related matters (.2).					
08/23/2024	[Asset Analysis and Recovery]: Emails with legal department of Chase regarding turnover of the account and scheduling meeting with branch manager to effect same, changing signatory, and granting full administrative access to accounts, and emails with A. Pavon regarding same (.2); work with C. Perez on analyzing transaction involving property in Indiana and advisor, review documents regarding same, strategize regarding same and contacting advisor involved, and emails with R. Landy regarding same (.6); emails with counsel for Bank of Tampa regarding certain accounts and discuss with my counsel (.2); review Warranty Deeds and related documents for Bradford's condo in St. Pete and emails and discuss with counsel regarding same and related issues for purposes of taking control of condo (.4); emails with A. Pavon and insurance agent regarding insurance policies for various Florida properties and provide further input to A. Pavon regarding confirming and securing insurance on other properties (.3); emails and discuss with C. Perez and R. Landy engagement of transactional counsel to prepare purchase and sale agreement of the entity through which Bradford owns the condo in Mexico and related matters and provide input regarding same and the proposed terms of the agreement (.3); review Certificates of Release of Federal Tax Liens sent to Drive Planning office, emails with counsel regarding same and payment of liens, and coordinate investigation of same (.3).	KDM	2.30	\$395.00	-	\$908.50
08/23/2024	[Business Operation]: Call with Receiver regarding employment matters (0.2); email exchange with counsel for Julie Edwards regarding employment matters (0.2); review and analyze email from Mary Cagle and draft response (0.1); research regarding Georgia employment separation requirements (0.2); call with Julie Bowen	RML	0.90	\$395.00	-	\$355.50

	regarding separation of Florida employee and draft memorandum regarding same (0.2).				
08/23/2024	[Business Operation]: Review status of employees Julie Bowman, Allen Montero, Jillian Wilkie, Mary Cagle and Liz Mace ahead of running payroll (.2); email exchanges with counsel for Cimplifi regarding duplicate forensic image (.1); telephone call with ADP to update payment instructions, update employees, and change login details (1.4).	АР	1.70	\$250.00	- \$425.00
08/23/2024	[Asset Analysis and Recovery]: Telephone calls with Truist regarding frozen account of Melissa Solheimer (1.2); receipt of policies from W. Greene and brief review of same (.5); email exchange with J. Burkhalter regarding properties without insurance (0.1); email exchange with R. Roman regarding insurance (0.1).	АР	1.90	\$250.00	- \$475.00
08/24/2024	[Case Administration]: Draft frequently asked questions for receivership website and research answers for same (3.7); respond to investor inquiries by phone and email (4.7).	СРМ	8.40	\$375.00	- \$3,150.00
08/24/2024	[Employment Application]: Further discuss proposed counsel in Mexico to assist with sale of the condo in Cabo San Lucas and proposed reduced rates and retainer amount, review and approve engagement letter, and coordinate preparation of Motion to employ counsel.	KDM	0.30	\$395.00	- \$118.50
08/24/2024	[Business Operation]: Review Drive Planning accounts online to confirm that all amounts in accounts were transferred to new temporary fiduciary accounts at Truist Bank (.2); discuss with C. Perez the invoice of contractor performing renovations on certain units in St. Petersburg, review same, and confirm payment will be made directly from new operating accounts (.2); emails with J. Bowman regarding same and related matters (.1).	KDM	0.50	\$395.00	- \$197.50
08/24/2024	[Case Administration]: Emails with Stretto and C. Perez regarding the exchange of documents for purposes of setting up online portal for investors to upload information and documents and discuss with C. Perez the status of same.	KDM	0.20	\$395.00	- \$79.00
08/24/2024	[Asset Analysis and Recovery]: Emails and	KDM	0.20	\$395.00	- \$79.00

	discuss with counsel confirming that all of the cattle is sufficiently insured and provide input regarding same.					
08/25/2024	[Asset Analysis and Recovery]: Emails with R. Landy regarding contacting advisor regarding property purchased by Drive Planning and transferred to him, review documents regarding same, and provide to R. Landy in preparation for call (.3); email from counsel for investors regarding case law favorable to Receivers and review same, and discuss with C. Perez (.7).	KDM	1.00	\$395.00	-	\$395.00
08/25/2024	[Business Operation]: Emails with A. Pavon and J. Burkhalter regarding the terms of the contract for the gala at the event space, including the cancellation policy and the refund amounts based on date of cancellation and review portions contract.	KDM	0.20	\$395.00	-	\$79.00
08/25/2024	[Case Administration]: Emails with A. Pavon and L. Scruggs regarding obtaining proposals from two document management companies for purposes of storing and searching documents and data collected from various sources.	KDM	0.10	\$395.00	-	\$39.50
08/26/2024	[Case Administration]: Call with Cowrin Marcum, counsel for Burney, regarding dismissal and order staying case brought against Drive Planning.	RML	0.20	\$395.00	-	\$79.00
08/26/2024	[Asset Analysis and Recovery]: Review and analyze insurance documents provided by K. Greene (0.1); work on insurance related to Yacht and review and analyze document provided by carrier (0.1); call with Aaron Danzing regarding return of yacht proceeds and other matters (0.2); call to Captain Lance Brooks regarding maintenance and supervision of yacht (0.3); attend partial call with K. Greene regarding Georgia insurance (0.3); review and revise letter to Demand Letter to Coinbase (0.1).	RML	1.10	\$395.00	-	\$434.50
08/26/2024	[Asset Analysis and Recovery]: Email exchange with E. Bisson of Truist Bank to discuss status of turnover of account (.1); email exchanges with A. Schwartz regarding subpoenas to Amex and Chase and discussion with C. Murena regarding same (.2); receipt and review of multiple insurance policies and create spreadsheet of same (1.2); email exchange with K. Greene regarding upcoming telephone conference (.1); email exchange and	АР	8.00	\$250.00	-	\$2,000.00

	regarding insurance for yacht (.5); receipt and review of correspondences from A. Danzig regarding coinbase and notice of cancellation (.2); email exchange M. Haye regarding promissory note payments moving forward and final revisions to letter regarding same (.3); video conference with J. Burkhalter to discuss bank accounts, TBR Supply House, Burkhalter Farm, and Staurolite (1.7); review of multiple accounts held at Chase, American Express, South State Bank, and Citi Bank and prepare summary of same to Receiver (2.0); telephone conference with K. Greene regarding insurance on properties (.4); draft demand letter to coinbase (.8); review of multiple policies insured through Rick Roman and e-mail exchange with K. Murena and R. Landy regarding same (.5).					
08/26/2024	[Asset Analysis and Recovery]: Review and analyze documents related to recovery of assets from Linarducci (0.2); review and analyze email from SEC regarding potential transfer target and research same (0.2).	RML	0.40	\$395.00	-	\$158.00
08/26/2024	[Case Administration]: Telephone conference with Clerks of the Southern District South Carolina/Charleston and Colombia divisions regarding Miscellaneous action filing (.2); telephone conferences with Clerk of the Middle District of Tennessee regarding miscellaneous action filing (.2); telephone conference with Clerk of the New Jersey District regarding miscellaneous action filing (.1).	lfd	0.50	\$100.00	100.0%	\$0.00
08/26/2024	[Case Administration]: Update Investor's list compiled from investor emails/calls.	lfd	0.80	\$100.00	100.0%	\$0.00
08/26/2024	[Case Administration]: Strategize regarding ediscovery issues, including preserving data, collecting data, and storing data for review and use in case.	KP	0.40	\$375.00	-	\$150.00
08/26/2024	[Case Administration]: Communications with document platform and forensic companies regarding pricing.	LS	1.70	\$275.00	25.0%	\$350.62
08/26/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email	jas	3.20	\$100.00	25.0%	\$240.00

	account.					
08/26/2024	[Case Administration]: Exchange emails with tax accountant and with various investors for tax issues (1.0); communicate with investors and advisors regarding case status and receivership process (3.7); work with Stretto to design secure portal and investor interface (1.0).	СРМ	5.70	\$375.00	-	\$2,137.50
08/26/2024	[Asset Disposition]: Analyze insurance policies and, for each policy, identify the insured entity and the specific property insured.	MJK	2.00	\$225.00	25.0%	\$337.50
08/26/2024	[Case Administration]: Emails with R. Landy and counsel for investor who sued Drive Planning in Indiana state court regarding proposal to stay action pending resolution of receivership and provide input to R. Landy regarding further communications with counsel and possible need to engage local counsel for purposes of action and limited filings (.2); telephone calls and emails with representative of bank regarding proposed interest rates for operating fiduciary account of Estate with insured cash sweep protection, additional information needed to open account, and related matters, provide requested information, complete application, review and revise Services and Software Agreement and send to bank, receive and review fulling executed agreement, and discuss with team (.8); emails with representative of another bank regarding information needed to complete application and provide same (.2); receive confirmation of filing Misc. Actions in various jurisdictions and emails with team regarding same and related matters (.2); emails with L. Scruggs regarding negotiation with document management company regarding proposal for storing documents and data of the Estate and provide input regarding further negotiations (.2); review multiple notices of commencement of Misc. Actions in various jurisdictions, emails and discuss with team, coordinate confirming filings in other jurisdictions and provide direction regarding responding to inquiries from the Clerk's offices, and send email to SEC counsel notifying them of Misc. Actions (.4); emails with local counsel regarding filing of Notice of Appearance for R. Landy and A. Pavon and discuss with team same and issue with receiving electronic filings (.1).	KDM	2.10	\$395.00		\$829.50

08/26/2024 [Business Operation]: Further emails with

team and Cimplifi regarding the format in which forensic image of J. Edwards's computer will be provided, follow up on timing of same, and receive updates (.2); emails and discuss with A. Pavon proposal from another IT vendor to forensically image the four laptop computers seized at Drive Planning office, review proposal, emails with counsel regarding same, coordinate obtaining another proposal, and provide direction regarding specific work to be done (.4); emails and telephone calls with team regarding connection of new operating account to ADP, procedures and timing of payroll, and authorizing payroll to certain employees (.4); emails and discuss with C. Perez payment of invoice from contractor for renovation of certain units. review updated invoice, emails with property manager and C. Perez regarding payment information, work on sending payment, and receive confirmation of same from bank (.3); email from A. Pavon regarding access to bank and credit card accounts of the Ranch, gaining access to books and records, and scheduling call with bookkeeper and accountant regarding same, review summaries of accounts, and provide direction regarding obtaining access to same and communications with bookkeeper and accountant (.3).

KDM 1.60 \$395.00 - \$632.00

08/26/2024

[Asset Analysis and Recovery]: Emails with counsel for investors regarding case law regarding nationwide jurisdiction for recovery claims and review case (.3); further emails with legal department of JP Morgan Chase regarding scheduling inperson meeting to sign signatory cards, take full administrative control of accounts, and open new temporary account, and discuss with team (.2); follow up with Burkhalter's counsel regarding the status of liquidation of cryptocurrencies and transfer of proceeds to Chase account and discuss with team (.2); emails with counsel for Burkhalter regarding his being locked out of the account, provide direction to my counsel regarding contacting Coinbase, providing Receivership Order, and demanding liquidation and transfer of proceeds, and further emails with Burkhalter's counsel regarding same (.2); emails and discuss with A. Pavon confirmation of tax liens and other tax debts for various real properties, review notices of

KDM 4.10 \$395.00 - \$1,619.50

liens and other debts, and provide direction regarding confirming debts and ownership of the properties prior to payment (.3); emails with counsel for Burkhalter regarding Notice of Cancellation of insurance policy for the yacht and the need to sell it before cancellation, review notice, and provide direction to my counsel regarding same and updating insurance tracking chart (.2); emails with A. Pavon and insurance agent regarding possible renewal of insurance for the yacht and information needed for same, discuss with team, and provide requested information (.2); email from Georgia insurance agent forwarding policies covering certain properties, review policies and declaration pages, and discuss with A. Pavon (.4); review updated insurance tracking chart. discuss with A. Pavon same, the status of confirming insurance on various properties and other necessary insurance, further investigation of same, and having M. Koch assist with investigation, and provide input regarding same (.8); emails with counsel for Burkhalter and R. Landy regarding scheduling call to discuss the yacht, insurance, and marketing it for sale, and telephone call with counsel regarding same, contacting Coinbase to liquidate the cryptocurrencies, and obtaining list of assets, and strategize with R. Landy regarding same (.4); further discuss with R. Landy and A. Pavon communications with Coinbase regarding liquidation of cryptocurrencies and transferring proceeds to Estate and provide further direction regarding same (.2); review and revise letter to Coinbase demanding liquidation of cryptocurrencies and transfer of proceeds to Estate, emails with counsel regarding same, and coordinate sending to Coinbase (.3); review letter to maker of promissory note demanding payment to Estate and further discuss with team following up on same (.2); provide input to R. Landy regarding communications with captain regarding maintenance of the yacht and Marine Max regarding same and marketing it for sale and receive updates from R. Landy regarding same (.2).

08/26/2024

[Employment Application]: Discuss with C. Perez proposed employment of Stretto for creating online portal for investor documentation and communications with investors and employment of Mexican

KDM 0.50 \$395.00

\$197.50

	counsel for sale of condo in Cabo, the reduced hourly rates and requested retainers for those professionals, the details and scope of the proposed engagements, and conferring with the parties regarding same (.3); prepare and send emails to SEC counsel regarding the proposed engagement of professionals and request their positions on same for purposes of Motion to employ, and emails from SEC counsel confirming no objections to same (.2).					
08/26/2024	[Asset Disposition]: Conference with Receiver regarding yacht liquidation and maintenance strategy (0.2); call with Gabriel Gonzalez regarding yacht brokerage agreement (0.2).	RML	0.40	\$395.00	-	\$158.00
08/26/2024	[Case Administration]: Email exchange with K. Floyd of Cimplifi to discuss format of turnover of documents (0.1); review of proposals from Disco, Lexbe, and Envista Forensics and email exchanges regarding same (0.2).	АР	0.30	\$250.00	-	\$75.00
08/26/2024	[Business Operation]: Email exchange with J. Shook of Expansive to discuss termination of lease and final revisions to letter regarding same (0.2); email exchange with local counsel regarding cancellation of lease in Georgia (0.1).	АР	0.30	\$250.00	-	\$75.00
08/27/2024	[Asset Analysis and Recovery]: Review and analyze email regarding Florida insurance coverage (0.1); review and analyze notice of cancellation of deposition in Macgruder case (0.1); work on issues and investigation related to Mr. Linarducci (0.1); call with Joe Prieto regarding stay of New Hampshire case and broker co-defendant (0.2); work on asset collection strategy (0.4).	RML	0.90	\$395.00	-	\$355.50
08/27/2024	[Case Administration]: Analyze proposal from forensic IT vendor to determine potential alternatives.	KP	0.10	\$375.00	-	\$37.50
08/27/2024	[Asset Analysis and Recovery]: Telephone call with Middle District of Alabama regarding notice of filing to commence miscellaneous action (.2); email exchanges with Coinbase providing demand letter and final edits of demand letter (.3); continued in-depth review of insurance policies and discussion with team regarding new policies required (.4).	АР	0.90	\$250.00	-	\$225.00

08/27/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	2.80	\$100.00	25.0%	\$210.00
08/27/2024	[Business Operation]: Complete Separation Notice for Drive Planning employees for attorney review.	jas	0.70	\$100.00	25.0%	\$52.50
08/27/2024	[Case Administration]: Update Investor's list compiled from investor emails/calls.	lfd	0.40	\$100.00	100.0%	\$0.00
08/27/2024	[Case Administration]: Respond to investor and financial advisor inquiries by phone and email and update FAQs on receivership website.	CPM	4.70	\$375.00	-	\$1,762.50
08/27/2024	[Business Operation]: Emails with C. Perez and J. Bowman regarding payment of contractor renovating two units in St. Petersburg and work on sending payment for balance due under invoice (.2); emails with C. Perez and J. Bowman regarding timing of payment for countertops for the units and working on paying initial deposit (.2); emails and telephone call with counsel regarding payroll to be made to certain employees through ADP, confirmation that ADP account is operational, review proposed payroll, and authorize same (.3); emails with counsel regarding issues to raise with IT vendor imaging the laptop computers and provide direction to team regarding same (.2); review and discuss with counsel termination/separation notices to send to various employees and emails with R. Landy regarding revisions and finalizing same (.3).	KDM	1.20	\$395.00	-	\$474.00
08/27/2024	[Asset Analysis and Recovery]: Telephone call with branch manager of Chase regarding the turnover of the account, the scope and directives of the Appointment Order, and scheduling appointment for same and discuss with team (.2); coordinate following up with Coinbase on demand for liquidation of cryptocurrencies and transfer of proceeds to the Estate and receive updates from counsel regarding same (.2); review emails with Coinbase and A. Pavon regarding demand for liquidation and turnover and confirmation of receipt of same and coordinate following up to expedite same (.2); email from legal	KDM	2.50	\$395.00	-	\$987.50

08/27/2024

08/27/2024

department of Coinbase regarding the Appointment Order and their intention to comply with our demand letter and with Order by filing certified statement with the Court and emails with my counsel regarding same and related matters (.3); emails with counsel and investor regarding Drive Planning's investment in race team, review further information from investor regarding same, discuss with counsel, and provide direction regarding investigation of same (.3); emails and telephone calls from and to counsel for advisor regarding the receivership and related matters and strategize with R. Landy regarding same (.3); telephone call with counsel for investors regarding his intention to commence action against an advisor and discuss with R. Landy (.2); discuss with M. Koch various insurance issues and provide direction regarding same (.2); email from counsel for D. Bradford regarding the company he and his wife created to purchase the Mexican condo, related matters, the Certificate of Organization, and wire instructions for the to send certain funds to the Estate, review and send Certificate of Organization to counsel, and strategize regarding whether to have company transferred to the Estate (.3); prepare and send email for forensic accountants regarding claims of investors and potential claims of Estate against certain advisors, investigating same, and					
preparing transaction detail reports and discuss with team (.3).					
[Asset Disposition]: Emails and discuss with R. Landy proposed listing agreement with and maintenance services by Marine Max, review draft Listing Agreement, and strategize regarding same (.3); emails and discuss with team regarding obtaining proposal from another yacht broker and provide direction regarding same (.2).	KDM	0.50	\$395.00	-	\$197.50
[Employment Application]: Prepare and send emails to counsel for Burkhalter and counsel for Relief Defendants regarding my proposed employment of Stretto to create and host online portal for investors to upload documents and of Mexican counsel to assist with sale of condo in Cabo, and further discuss with team same and status of preparation of Motion to employ these professionals.	KDM	0.20	\$395.00	-	\$79.00

08/27/2024	[Case Administration]: Receive and review additional notices from the Court of the Complaint and Appointment Order confirming commencement of Misc. actions, emails with J. Serna regarding same and addressing issue raised by Clerk of one District Court, and provide direction regarding same (.4); further emails with two banks regarding additional information needed to open fiduciary accounts for the Estate, provide additional information and copy of document, and telephone call with one representative regarding the interest rate (.4); review Standing Order regarding the Judge's procedures and related matters and emails with team regarding same (.3); emails and telephone call from investors and discuss with C. Perez same and her recent communications with investors (.3); discuss with team setting up Zoom call with multiple investors to answer various questions and provide input regarding same (.2).	KDM	1.60	\$395.00	-	\$632.00
08/27/2024	[Business Operation]: Work on analysis of payroll (0.2); work on analysis of employment and payroll issues (0.3); work on separation of Georgia employees (0.2); work on termination of office leases (0.2).	RML	0.90	\$395.00	-	\$355.50
08/27/2024	[Asset Disposition]: Review and analyze proposed yacht broker agreement (0.2); confer with Receiver regarding same (0.1).	RML	0.30	\$395.00	-	\$118.50
08/27/2024	[Case Administration]: Review and analyze Court's Standing Order on Guidelines to Parties and Counsel.	RML	0.20	\$395.00	-	\$79.00
08/27/2024	[Business Operation]: In-person meeting with M.Dhanji to run pay-roll of Drive Planning employees (2.0); review of multiple employee tax return information to prepare termination letter (0.5).	АР	2.50	\$250.00	-	\$625.00
08/28/2024	[Asset Analysis and Recovery]: Analyze estate assets (0.1); confer with Receiver regarding recovery of assets and reports to court (0.2); review and analyze photos and information related to Georgia properties (0.2); work on subpoena for Juan Echeverri, and draft email to A. Danzig regarding same (0.1); review and revise proposal regarding Yacht servicing (0.2).	RML	0.80	\$395.00	-	\$316.00
08/28/2024	[Employment Application]: Draft Motion and Proposed Order to Employ Stretto as a Notice and Claims Data Agent (.6); draft	lfd	1.20	\$100.00	100.0%	\$0.00

	Motion and Proposed Order to Employ Pikoff Attorneys to provide advice regarding legal issues arising in Mexico (.6).					
08/28/2024	[Business Operation]: Email exchanges with J. Burkhalter and S. Cook regarding events at Staurolite Barn and contracts for same (.5); receipt and review of multiple contracts for events at Staurolite Barn to determine options of Receiver to collect money and/or not refund (.6); draft letter to C. Shafer demanding outstanding payment of \$4,000 for wedding at Staurolite Barn (.7); email exchange with J. Haff regarding cancellation of event at Staurolite Barn and refund (.3); email exchange with Receiver discussing cancelled event that required return of deposit (.2).	АР	2.30	\$250.00		\$575.00
08/28/2024	[Case Administration]: Update Investor's list compiled from investor emails/calls.	lfd	1.50	\$100.00	100.0%	\$0.00
08/28/2024	[Case Administration]: (No charge) Research regarding District Courts in the United States for filing.	pl	0.40	\$100.00	100.0%	\$0.00
08/28/2024	[Case Administration]: Review docket of over forty district courts and confirm filings of miscellaneous actions, save copy and organize miscellaneous actions files.	jas	3.20	\$100.00	25.0%	\$240.00
08/28/2024	[Asset Analysis and Recovery]: Review email from Patricia Baloyra regarding Warranty Deed for property located at Unit 3104, 100 1st Ave N, St. Petersburg, Florida 33701 (.1); revise same (.2).	lfd	0.30	\$100.00	100.0%	\$0.00
08/28/2024	[Case Administration]: Continue to update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	4.50	\$100.00	25.0%	\$337.50
08/28/2024	[Case Administration]: Communication regarding social media contact (.5); Communications with Forensic companies regarding pricing/quotes and conflict checks(.4).	LS	0.90	\$275.00	25.0%	\$185.62
08/28/2024	[Case Administration]: Respond to investor calls and emails and gather investor information from various agents and discuss information from investors with Receiver.	СРМ	6.50	\$375.00	-	\$2,437.50
08/28/2024	[Asset Analysis and Recovery]: Revision of	MJK	0.60	\$225.00	25.0%	\$101.25

	identify insured property.				
08/28/2024	[Business Operation]: Emails with Truist Bank regarding transfers to contractors for renovations of certain units in Florida to be leased and discuss with C. Perez receipt of funds by contractors (.2); emails with J. Burkhalter regarding contract for event space and customer's failure to pay balance due after event, review contract, emails with A. Pavon regarding same, and provide direction to A. Pavon regarding demanding balance (.3); emails and discuss with A. Pavon various matters related to operating the ranch, store, event space in Georgia, one cancellation request, and other matters, and provide input regarding addressing issues (.4); telephone call with A. Pavon regarding status of investigating lien notices, confirming amounts due, sending Receivership Order to taxing authorities, and related matters, and provide direction regarding same (.2); emails and discuss with counsel cancellation of leases and review letter to landlord of Georgia office cancelling lease (.2); emails with J. Burkhalter regarding tax notices, review same, and coordinate confirming debt prior to payment (.2); emails with J. Burkhalter and discuss with A. Pavon loan for purchase of the store and the monthly mortgage payment, review Note and coordinate reviewing other loan documents, and confirming amounts (.3); emails with J. Burkhalter and discuss with Elorida property and payment of balance on invoice for same and initiate payment from Property Solutions operating account (.2); emails with J. Burkhalter and A. Pavon and discuss with A. Pavon request for cancellation of contract for future gala at event space, review contract, and coordinate approving cancellation and return of deposit (.2); emails with R. Landy and counsel for Burkhalter regarding efforts to contact social media consultant for Drive Planning and possible need for Subpoena, and requesting assistance and discuss with team (.1).	KDM	2.30	\$395.00	- \$908.5
08/28/2024	[Asset Analysis and Recovery]: Review court filing from Truist Bank confirming balances in various accounts and discuss with team same and related matters (.2); emails with forensic accountant regarding	KDM	6.50	\$395.00	- \$2,567.5

transfers to advisors, status of analyzing bank accounts and preparing reconstruction of same, applicable law and prior recovery actions of receiver against advisors in similar receivership, and related matters, and review filings from that other actions for purposes of investigating and formulating Estate's claims (.6); emails and telephone calls with counsel for investors regarding claims against certain advisors and third parties, demands we made to advisors for turnover of assets and payment of debts, and related matters, and strategize regarding same (.5); email from counsel for investors regarding additional advisor and third party to investigate and emails with my counsel regarding same (.2); emails and telephone calls with my counsel regarding status of liquidation of cryptocurrency at Coinbase, transfer of proceeds to Estate, and wire instructions to use for transfer, coordinate sending email to confirm timing of liquidation and provide wire instructions, and review email to Coinbase regarding same (.3); emails with JP Morgan Chase and A. Pavon regarding upcoming meeting to finalize turnover of account, grant administrative access, and change signatory (.1); visit Chase Bank branch to meeting with bank regarding turnover of account and sign documents to effect turnover of account, change of signatory, and set up online access to accounts and emails and discuss status of same with A. Pavon (2.2); emails with forensic accountant regarding bank records needed for account reconstruction including wire transfer confirmations, status of obtaining from Truist Bank, records on computer of chief administrative officer, and forensic images of her computer, and follow up with team on these matters (.3); email from financial advisor forwarding additional pictures of the ranch and related properties, review same, and discuss with team (.2); telephone call with financial advisors and C. Perez regarding various matters related to marshalling and preserving assets, insurance, marketing various assets and real properties for sale, selecting realtors and yacht broker, forensic images of laptop computers, ADP records, transfers to advisors, preparation of account reconstruction, creation of investor portal for uploading of documents, tax disclosure to provide to investors, and related matters

	(.8); telephone call with A. Pavon regarding status of analyzing insurance policies, confirming all properties and businesses are adequately insured, all employees at ranch, store and event space are covered by workers compensation policies, emails and calls with third insurance agent who procured policies on certain properties, and related matters and provide input regarding same (.3); review emails with third insurance agent regarding the receivership, request for all policies, and scheduling call to discuss same (.1); telephone call with A. Pavon regarding mortgage on the store, deadline to make payment, and confirming same, underlying documents, and lender, and provide input regarding same (.2); emails with financial advisor and A. Pavon regarding accessing ADP account to generate reports regarding transfers to advisors and following up on same (.2); email from forensic accountant regarding progress with reconstruction of accounts, additional bank records needed for same, various transfers to advisors, and related matters and strategize regarding same (.2); email from counsel for investors regarding additional information regarding a third party and an advisor against which the Estate and investor may have claims and send email to A. Pavon regarding same (.1).					
08/28/2024	[Asset Disposition]: Emails with financial advisor his meeting with potential realtor for the Georgia properties and obtaining proposals from other realtors for purposes of marking properties in Georgia for sale and further strategize with team (.3); emails with property manager regarding referral for yacht broker and insurance issues, discuss with team same, and coordinate contacting yacht broker (.2); emails with R. Landy regarding same and agreement with captain of the yacht for reduced monthly payment and schedule call to further discuss (.1).	KDM	0.60	\$395.00	-	\$237.00
08/28/2024	[Case Administration]: Emails with team regarding status of updating investors list with information provided by investors by email and telephone, review latest version of list, and discuss with C. Perez same and her recent communications with investors (.3); email with team regarding status of receiving confirmation of filing of Misc. actions pursuant to 28 USC sec. 754 and	KDM	2.80	\$395.00	- \$1	,106.00

related issues, and provide input regarding addressing issues related to same (.2); emails with Stretto and C. Perez regarding investor contact information to use for notice to all investors regarding the online portal for uploading documents and further discuss with C. Perez status of setting up portal (.2); emails and telephone call with bank and Verita regarding the interest rate for the fiduciary account being opened and emails with Verita regarding forms to sign and additional information required for same (.4); further emails with Stretto regarding status of obtaining EIN for purposes of opening fiduciary account at another bank, follow up with M. Dhanji regarding status of same, and receive update regarding same (.2); emails with financial advisor regarding investor communications regarding attorneys representing other investors and discuss with C. Perez (.1); discuss with counsel requirement in Order for Defendant to file and serve statement regarding assets, creditors, and other information, confirming with SEC counsel that it applies to Burkhalter and not me, and confirming that Burkhalter has not satisfied requirement, review provision of Order, and prepare and send email to SEC counsel regarding same (.3); email from SEC counsel regarding same, prepare and send email to SEC responding to same and proposing notice to file with the Court, and discuss with team (.2); emails from investors regarding their investments and losses, the advisors through which they invested, and contact information, emails with team regarding same, and discuss with C. Perez same and her communications with other investors (.6); email from financial advisor regarding revisions to be made to tax disclosures to be provided to investors in response to their inquiries and referring them to their tax consultants, review same, and discuss with C. Perez (.2); emails with counsel for investors and C. Perez regarding IRA and tax related questions from investors (.1).

08/28/2024	[Case Administration]: Telephone conference with Clerk of the Massachusetts District Court.	lfd	0.10	\$100.00	100.0%	\$0.00
08/28/2024	[Case Administration]: Review and analyze Appointment Order for filing deadlines.	RML	0.10	\$395.00	-	\$39.50
08/28/2024	[Employment Application]: Work on	RML	0.10	\$395.00	-	\$39.50

	retention of local counsel in New Hampshire for Prieto case.					
08/28/2024	[Asset Analysis and Recovery]: Email exchange with Chase to discuss turnover of accounts (0.1); email exchange with Coinbase (0.1); brief review into case law regarding suing sales agents in Georgia (0.2); continued in-depth review of Drive Planning Google Drive to obtain appraisals, sale documents, and additional property information (1.7).	АР	2.10	\$250.00	-	\$525.00
08/28/2024	[Case Administration]: Review of multiple notice of filings in multiple districts to determine receipt of filing and provide J. Serna with instruction on two districts with delivery delays.	АР	0.50	\$250.00	-	\$125.00
08/29/2024	[Asset Analysis and Recovery]: Review and analyze emails regarding Florida insurance (0.1); review and analyze email exchange with counsel for SEC regarding obligations of Appointment Order and work on strategy related to same (0.1); review and analyze proposals for yacht maintain (0.1); call with Receiver regarding sale and maintenance of yacht (0.2); review and analyze Appointment Order regarding retention of individuals for assistance with preservation of yacht and other assets (0.3); review and analyze letter from Coinbase regarding contents of account (0.1); call with Steve Councill, attorney for Mr. Linarducci regaing recovery of assets transferred to him and draft email to Mr. Councill (0.3); confer with Capt. Brooks regarding yacht maintenance (0.1); confer with Receiver regarding analysis of Appointment Order regarding preservation of certain assets (0.1).	RML	1.40	\$395.00	-	\$553.00
08/29/2024	[Case Administration]: Update Investor's list compiled from investor emails/calls.	lfd	0.30	\$100.00	100.0%	\$0.00
08/29/2024	[Case Administration]: Meeting with IT forensic vendor (0.8); follow up with Forensic accountant regarding inventory of laptops (.3); communication with Kenneth Murena regarding forensic requirements (.2); contact IT forensic vendors for pricing/quotes (.5).	LS	1.80	\$275.00	25.0%	\$371.25
08/29/2024	[Case Administration]: Work with tax accountant on memo to respond to investors' tax questions (1.0); and respond to investor queries by telephone and email (3.9); participate on zoom call with group of	СРМ	5.90	\$375.00	-	\$2,212.50

	investors (1.0).					
08/29/2024	[Asset Analysis and Recovery]: Receipt and review of The Burkhalter Ranch Corp policy to determine need for additional cattle insurance (.4); email exchange with K. Murena and R. Landy regarding personal property purchased by Drive Planning in the possession of T. Burkhalter (.2); email exchange with Receiver regarding Indianapolis properties (.1); email exchange with J. Burkhalter regarding mortgage note (.1); receipt and review of TBR Supply Mortgage note and provide summary of same to K. Murena (1.0); review of document provided by J. Bowman and prepare comparative sheet for insurance broker and real estate brokers (.5); email exchange with M. Hayes following up on demand letter (.1); finalize comprehensive list of assets and insurance and public records of same (2.0); email exchange with S. Bloyd from coinbase providing payment instructions (.1); draft demand letter to Tampa Bay Rays and review of contract in preparation of same (.9); email exchange with Chase Bank regarding frozen accounts (.1); telephone call and email exchange with Chris Weaver of Florida Strategic Planning to discuss Florida insurance (.3); email exchange with W. Greene regarding insurance (.1).	AP	5.90	\$250.00		\$1,475.00
08/29/2024	[Asset Analysis and Recovery]: Further revision of insurance policy list to confirm coverage of additional properties.	MJK	0.40	\$225.00	25.0%	\$67.50
08/29/2024	[Case Administration]: Emails with C. Perez and Stretto regarding consolidating all investors lists and confirming all email address for purposes of notice of investor portal to upload documents and information and discuss with C. Perez (.2); email from SEC counsel regarding proposed Notice to file with the Court regarding the sworn statement to be filed and served on Receiver and SEC regarding assets, employees, creditors and other information, emails with R. Landy and A. Pavon regarding same, and provide input regarding same (.3); discuss with C. Perez inquiry from investors regarding IRA and non-IRA investments, treatment of eventual distributions, and related tax issues, and prepare., send email to counsel for investors regarding same (.5);	KDM	1.60	\$395.00	-	\$632.00

discuss with C. Perez her communications with investors regarding various issues and upcoming Zoom meeting with investors, and discuss with team procedures and logistics for same and inviting all known investors to the meeting (.4); email with A. Pavon and maker of promissory note following up on demand for payments to Estate and discuss with team same and strategy for collecting debt (.2).

08/29/2024

[Asset Analysis and Recovery]: Emails with A. Pavon and R. Landy regarding insurance issues, telephone call with third insurance agent regarding policies in Florida, updated list of all properties and known insurance policies, and obtaining policies for certain of the properties, review emails with Georgia insurance agent regarding same, review updated list of properties and insurance, and provide direction regarding same (.4); telephone calls with R. Landy regarding his negotiation with boat captain, the proposed reduced monthly fee, amount Drive Planning failed to pay him, the scope of his work, various issues to address with captain, certain language in Appointment Order authorizing expenses to preserve assets, and preparation of motion to approve payment to captain to preserve yacht in which Estate has interest (.4); continue working on having Chase's legal department authorize and effect the transfer of the account balance to the Estate, discuss and provide direction to A. Pavon regarding further communications with legal department, and review emails with legal department regarding same (.4); discuss with A. Pavon the status of receiving confirmation of liquidation of cryptocurrencies by Coinbase and having proceeds transferred to the Estate, review emails with Coinbase regarding same, and provide further input to A. Pavon (.4); email from Coinbase's legal department providing formal response to our demand letter and the Appointment Order and providing sworn statement, as required by order, to be filed with the Court, review same, and discuss with my counsel same and progress and timing of liquidation and transfer of proceeds to the Estate (.2); emails and discuss with R. Landy following up with counsel for advisor regarding certain real property, payments to make to the Estate, and related issues, telephone call to counsel for that advisor regarding same

KDM 3.40 \$395.00 - \$1,343.00

and related matters, and review email from R. Landy to counsel regarding same (.5); review updated list of insurance for all of properties in which Estate has interest, emails and discuss same with team, and provide further direction additional policies to procure (.2); coordinate sending demand to company in which Drive Planning invested to request distribution to Estate. review related document and website of company, and provide input regarding same (.3); discuss with C. Perez the Warranty Deed to propose to D. Bradford for purposes of transferring his interest in condo to the Estate, review and revise Warranty Deed, and emails with R. Landy regarding same and further revisions to be made (.4); emails with financial advisor regarding his investigation of the Georgia properties, whether there are any appraisals, and issue with gun shop owner not paying rent for property owned by Burkhalters, and strategize regarding same (.2).

08/29/2024

[Business Operation]: Emails with L. Scruggs regarding additional laptops seized from Drive Planning office and obtaining proposal from IT vendor to forensically image all laptops and to make simple copies of documents to facilitate upload to document management platform and search and provide direction regarding same (.2); emails with one IT vendor regarding the scope of the project and further discuss with L. Scruggs (.2); review expense reimbursement request from J. Bowman for the Pearson units being renovated, discuss with C. Perez, and initiate payment from Property Solutions account (.2); review and revise letter to Tampa Bay Rays cancelling contract and requesting return of remaining funds and emails with my counsel regarding same (.3); discuss with M. Dhanji issues with obtaining EIN for the Estate and communications with IRS regarding same, and provide further direction regarding same (.2); review boxes of contents of St. Petersburg office, discuss with team organizing same for purposes of preserving possible evidence, and emails with financial advisor's office regarding same (.2); emails with Cimplifi and A. Pavon regarding shipment of hard drive with forensic image of J. Edwards's computer and discuss with team (.1); emails with A. Pavon regarding

KDM 2.60 \$395.00 - \$1,027.00

upcoming event, its cost, issues with selling

	tickets, and various public relations issues, and strategize regarding resolving issues (.3); emails with A. Pavon regarding note for the supply store on the ranch, the monthly payment and due date, calculation of amount due, and related matters, review Notice, and provide direct regarding communications with note holder (.4); emails with A. Pavon and employees of the ranch and store regarding procedures for payment for supplies and other items necessary to operate the ranch and store and further discuss with team (.2); emails with counsel regarding investigating ownership of the ranch, the barn, and the store, the contract between the ranch and the barn, confirm any liability between and among those businesses, and address certain insurance issues and provide direction regarding same (.2); email from Burkhalter's counsel regarding contact information for social media consultant and emails with team regarding same (.1).					
08/29/2024	[Asset Disposition]: Telephone call with R. Landy regarding his discussion with potential yacht broker regarding proposal and strategize regarding obtaining proposals from other brokers.	KDM	0.20	\$395.00	-	\$79.00
08/29/2024	[Employment Application]: Emails with C. Perez regarding the draft Motions to Employ Stretto and Mexican counsel, provide further input regarding same, email from C. Perez forwarding draft Motions and proposed Orders and the proposals to attach to same (.3); emails from R. Landy providing his revisions to the Motions and proposed Order, review same, make further revisions to both Motions and Orders, and coordinate confirming certain revisions and preparing Motions for filing (.5).	KDM	0.80	\$395.00	-	\$316.00
08/29/2024	[Asset Analysis and Recovery]: Draft and revise warranty deed and email to C. Perez regarding same.	PB	0.40	\$375.00	-	\$150.00
08/29/2024	[Asset Disposition]: Call with yacht broker.	RML	0.20	\$395.00	-	\$79.00
08/29/2024	[Employment Application]: Review and revise motion to retain Stretto and propose order on same (0.2); review and revise motion and order to employ Mexican counsel (0.1).	RML	0.30	\$395.00	-	\$118.50
08/29/2024	[Case Administration]: Review and revise	RML	0.20	\$395.00	-	\$79.00

	Receiver's notice concerning Drive Planning LLC sworn statement required by Appointment Order.					
08/29/2024	[Business Operation]: Email exchanges with personnel of ranch regarding credit card use (0.2); email exchange with J. Burkhalter regarding salary of ranch hand (0.1); email exchange with K. Murena providing summary of upcoming event at the ranch and recommendation to not move forward with same (0.2); telephone call C. Bennett to discuss outstanding balance for event (0.4); telephone call with J. Burkhalter regarding various outstanding items of the ranch and store (0.4).	АР	1.30	\$250.00	-	\$325.00
08/29/2024	[Case Administration]: Email exchange with Cimplifi regarding imaging.	AP	0.10	\$250.00	-	\$25.00
08/29/2024	[Employment Application]: Discuss motion to approve retention of Stretto with R. Landy.	AP	0.10	\$250.00	-	\$25.00
08/30/2024	[Asset Disposition]: Work on preservation of Yacht (0.2); review and analyze notices and letter provided by Coinbase (0.1); review and analyze email from counsel for Linarducci regarding home purchase by Drive Planning (0.1); review and revise warranty deed for 100 1st Ave N #3104 and work on recovery of property (0.2).	RML	0.60	\$395.00	-	\$237.00
08/30/2024	[Case Administration]: Update Investor's list compiled from investor emails/calls.	lfd	0.40	\$100.00	100.0%	\$0.00
08/30/2024	[Case Administration]: Continue to monitor receivership email account and update investor chart with information provided by numerous investors as they contact the Receiver via email, add all investor contact information to the receivership email account.	jas	2.10	\$100.00	25.0%	\$157.50
08/30/2024	[Case Administration]: Respond to investor inquiries by phone and email (3.4); and work with Stretto on communications to investors (1.0).	СРМ	4.40	\$375.00	-	\$1,650.00
08/30/2024	[Asset Disposition]: Telephone call and email exchanges with C. Jaime of Global Luxury Realty, LLC to discuss broker proposal needed, background on properties, and commission discount.	AP	0.70	\$250.00	-	\$175.00
08/30/2024	[Asset Analysis and Recovery]: Email exchanges and telephone call with	AP	1.80	\$250.00	-	\$450.00

08/30/2024	insurance broker detailing need for liability insurance on rental properties (.5); email exchange with counsel for Tampa Bay Rays regarding demand (.1); telephone call with American Express to discuss freeze of various credit cards and brief discussion with Receiver regarding same (1.0); email exchange with counsel for Coinbase regarding wire instruction change (.1); email exchange with Netjets following up on demand (.1). [Business Operation]: Communicate with IT Forensic Companies (.2); communicate with social media contact (.2); and	LS	0.70	\$275.00	25.0%	\$144.37
	Communicate with website contact regarding unpaid invoices (.3).					
08/30/2024	[Case Administration]: Emails with Stretto and C. Perez regarding additional investor emails and the status of compiling list and discuss with C. Perez same and status of preparing the investor portal (.2); emails and discuss with C. Perez issues related to investors claimed CORE and REAL investments, Drive Planning's spreadsheet related to same, separate accounts maintained by Drive Planning, confirming separation or commingling of funds, preparation of separate and consolidated reconstructions, and related matters, review spreadsheet, and emails with forensic accountant regarding same and document reviewed (.6); emails with R. Landy and A. Pavon regarding the draft Notice regarding Drive Planning's sworn statement required to be filed and served on the Receiver and SEC, review and revise same, and discuss with counsel (.4); receive and review form with EIN for the Estate, discuss with M. Dhanji and C. Perez, multiple emails with Stretto and Synovus Bank regarding same and completion of application to open fiduciary account, and telephone call from bank representative regarding same (.4); emails with CNB regarding the account application, the EIN, and additional information needed to open fiduciary account and emails and discuss with M. Dhanji (.2); emails with counsel for investors regarding communications from Burkhalter to investors and sending same to government and discuss with team same (.1).	KDM	1.90	\$395.00		\$750.50
08/30/2024	[Employment Application]: Emails with C. Perez and Stretto, and discuss with C.	KDM	1.10	\$395.00	-	\$434.50

Perez, need for call center to address technical issues with uploading documents to investor portal and related matters and approve same (.3); make final revisions to the Motion to Employ Stretto and proposed Order, review Stretto's proposal and Services Agreement and discuss certain aspects with Stretto representative and C. Perez, emails with local counsel regarding the proposed filing of the Motion and certain requirements, and coordinate finalizing and filing Motion (.5); emails with C. Perez regarding further revisions to make to the Motion to Employ Mexican Counsel and revise Motion (.3).

08/30/2024

[Asset Analysis and Recovery]: Emails with A. Pavon regarding vacant land in Georgia and related matters, review documents and information regarding same, and provide input regarding same (.3); email from counsel for advisor regarding property in which Estate has interest, loan documents, insurance, changing loss payee, office space, and landlord, emails with counsel regarding same, search for loan documents, and provide direction to counsel regarding same, contacting landlord, and related matters (.4); email from financial advisor regarding appraisals for certain Georgia properties, review same, emails with counsel regarding same, and follow up on status of scanning all records for the Blue Ridge properties (.4); emails and telephone calls with JP Morgan Chase and A. Pavon regarding the transfer of the account balance to the fiduciary account and provide direction regarding same and providing wire instructions for same (.3); email from R. Landy forwarding revised Warranty Deed for advisor to sign to convey St. Petersburg condo to the Estate, review and revise same, and coordinate having transactional counsel review (.3); emails with A. Pavon and insurance agent regarding the Florida properties to be insured and confirming that all other properties have sufficient insurance and review updated list of properties and insurance policies (.2); email from advisor responding to our demand for payments under the note and providing documents regarding his purported investments, review documents and other documents regarding Note and insurance on property, coordinate investigating property, mortgage, and insurance, follow

KDM 2.60 \$395.00 - \$1,027.00

up on preparation of Notice of Lis Pendens (.5); email with A. Pavon and Coinbase regarding status of liquidation of cryptocurrencies and the updated wire instructions to use to transfer proceeds to the Estate, and further discuss with team (.2).

08/30/2024

[Business Operation]: Further emails with Cimplifi and A. Pavon regarding the images captured of J. Edwards's computer and accessing same and provide input regarding same, uploading to document management platform, and searching records (.2); further emails with Burkhalter's counsel and R. Landy regarding social media consultant and discuss with team contacting same and taking control of accounts (.2); further emails with A. Pavon and NetJets regarding cancellation of contract and coordinate following up on same (.1); review contents of St. Petersburg office and coordinate organizing and preserving same and disposing of certain of the duplicative items (.3); emails with G. Hays regarding the outdoor supply and gun store leasing property from TBR store, failure to pay rent, ownership of store, operating agreement, counsel for company, and contacting counsel to demand rent and address issues related to insurance, review operating agreement, emails with my counsel regarding same, and provide direction regarding same (.4); emails with L. Scruggs regarding new proposals for imaging of hard drives and related charges, review same, and provide direction regarding negotiations with IT vendors (.2); emails with financial advisor regarding the operating agreement with the outdoor store, communicating with coowner, and addressing insurance issues, review operating agreement, and emails and discuss with counsel same (.4); emails with L. Scruggs and A. Pavon regarding Drive Planning's website, website administrator, obtaining copies of all pages, documents, and communications, and related matters, review invoices and provide input regarding same (.2); emails with A. Pavon and general counsel for Tampa Bay Rays regarding our demand letter and status of their gathering requested documents and discuss with team (.1).

KDM 2.10 \$395.00 - \$829.50

08/30/2024 [Asset Disposition]: Work with team on

KDM

0.80

\$395.00

\$316.00

	obtaining proposals from realtors for purposes of marketing Florida properties for sale, review updated list of properties, further discuss with A. Pavon and C. Perez, and strategize regarding same (.5); review proposal from one realtor, discuss with A. Pavon same and reduced commission rates, and strategize regarding same (.3).					
08/30/2024	[Case Administration]: Email exchange with L. Scruggs regarding website.	AP	0.10	\$250.00	- \$25.0	00
08/30/2024	[Asset Disposition]: Telephone call and email exchange with R. Hendrickson (insurance broker) to discuss sale of Florida properties (0.3); receipt and review of proposal from Coldwell Bankers and forwarding same to Receiver with comment (0.5); email exchange with J. Burkhalter to discussing multiple Georgia properties (0.2) review of property appraisal website regarding 6.5 acres in the name of Drive Planning (0.4).	АР	1.40	\$250.00	- \$350.C	00
08/31/2024	[Case Administration]: Further emails with financial advisor regarding the documents he located regarding the Blue Ridge properties and related matters and scanning and uploading same to document management platform, and coordinate same with L. Scruggs (.2); emails with Stretto regarding revisions to investor portal based on recommendations of forensic accountant and scheduling meeting to review portal, and discuss with C. Perez (.2); email from investor regarding a particular advisor's involvement and wrongdoing, third-party company that facilitated fraud, other investors and engagement of counsel to represent their interests, the Receiver's asset recovery efforts, and related matters, and discuss with C. Perez same and responding to investor (.3).	KDM	0.70	\$395.00	- \$276.5	50
09/01/2024	[Case Administration]: Prepare and send email SEC counsel forwarding draft Notice regarding requirement for Drive Planning to file and serve sworn statement for review and input, email from counsel approving same, and send email to counsel for Burkhalter forwarding draft Notice and requesting approval for comments.	KDM	0.20	\$395.00	- \$79.C	00
09/01/2024	[Case Administration]: Respond to investor inquiries by telephone and email (2.0); and work with Stretto on proposal for secure	CPM	2.70	\$375.00	- \$1,012.5	50

	portal (0.7).					
09/02/2024	[Asset Disposition]: Conference with Yacht Broker regarding possible agreement and work on related strategy.	RML	0.10	\$395.00	-	\$39.50
09/02/2024	[Business Operation]: Emails with J. Bowman regarding the weekly reports from Club 201, review two weekly reports, and emails with A. Pavon regarding same (.4); emails with J. Bowman regarding materials needed for unit being renovated and purchase of same, efforts to rent out certain units and approval of marketing plan, and pool service, reimbursement of same, and issues with handyman, discuss with C. Perez, review reimbursement request, and send payment to J. Bowman for reimbursement (.3).	KDM	0.70	\$395.00	-	\$276.50
09/02/2024	[Case Administration]: Email from counsel for investors to SEC and Receiver forwarding recording and transcript of recording of call between investor and Burkhalter, review and listen to same, and discuss with counsel.	KDM	0.20	\$395.00	-	\$79.00
09/02/2024	[Asset Analysis and Recovery]: Analyze file to identify applicable insurance for Georgia property and business.	MJK	0.20	\$225.00	25.0%	\$33.75
09/02/2024	[Case Administration]: Respond to investor inquiries by telephone and email (2.0); work with advisor to obtain investor list (1.0).	СРМ	3.00	\$375.00	-	\$1,125.00
09/02/2024	[Business Operation]: Work on property management and payroll issues for the St. Petersburg properties.	СРМ	2.40	\$375.00	-	\$900.00
09/03/2024	[Case Administration]: Draft email to counsel in Prieto v. Drive Planning case regarding stay (0.1); confer with Receiver regarding litigation strategy in Hansen and Magruder actions against Drive Planning (0.1); draft email to opposing counsel regarding Hansen and Magruder actions (0.1); Burney v. Drive Planning - review and analyze proposed joint motion for stay and proposed order on same and draft email response to opposing counsel (0.3).	RML	0.60	\$395.00	_	\$237.00
09/03/2024	[Business Operation]: Email exchange with J. Burkhalter regarding salary of workers to assess same (.1); review of amortization schedule for TBR Supply House, calculate interest, review of applicable interest rate, create excel amortization schedule, and e-	АР	2.30	\$250.00	-	\$575.00

mail exchange with Receiver providing analysis of overpayment towards interest based on loan terms (1.5); review of proposals for Staurolite Barn, including monster ball and rodeo and summary of same to Receiver (.3); review and analysis of sales reports for the bar's performance over two weeks (.2); email exchange with J. Burkhalter providing summary of livestock insurance and equipment insurance and requesting confirmation of sufficiency of same (.2).

09/03/2024

[Case Administration]: Email from counsel for Burkhalter confirming support for proposed Notice regarding Drive Planning's inability to meet requirement in Appointment Order to file and serve sworn statement regarding assets, creditors, and employees, discuss with team same and Burkhalter's disclosures, and coordinate finalizing and filing Notice (.2); confirm deadline to respond to Complaint in state court action against Drive Planning and emails with counsel regarding same, filing motion for extension of response deadline and motion to stay case pursuant to Appointment Order (.2); review Order granting Motion to employ Stretto to create and manage investor portal, discuss with C. Perez, and provide input regarding finalizing the portal and upcoming meeting with Stretto to address same (.2); discuss with C. Perez various calls with and questions from investors and advisors and provide input regarding responding to same (.3); review receivership website and coordinate updating it with additional court filings and frequently asked questions (.2); emails with Stretto and C. Perez regarding adding various email addresses to investors lists and other matters related to the investors portal and further discuss with C. Perez (.2); emails and discuss with R. Landy status of filing in two state court actions against Drive Planning Notices of Receivership and Request for Stay of Litigation pursuant to Appointment Order, communications with Plaintiffs' counsel in those actions, possible need to engage local counsel for two actions, and related matters, review emails with counsel for Plaintiffs, provide input regarding dealing with same, and work on locating local counsel (.3); email with R. Landy and Plaintiff's counsel regarding whether he will file Notice of Receivership Order and Stay

KDM 3.80 \$395.00 - \$1.501.00

of Litigation to obviate need to engage local counsel and further discuss with R. Landy (.1); emails and calls with three banks regarding additional information, authorizations, and documents to be signed to open fiduciary accounts and certain aspects and proposed uses of the accounts, review and sign additional forms including ICS enrollment documents. receive confirmation of processing of same, and send email with questions regarding same (.9); emails with team regarding status of opening accounts so funds can be transferred to them (.1); emails with L. Scruggs regarding clarification of proposal from one IT vendor, discuss with A. Pavon, and coordinate proceeding with having IT vendor image Drive Planning's computers (.3); email from investor regarding communication from Burkhalter to investors, review same, and emails and discuss with C. Perez (.2); email from financial advisor forwarding updated Memorandum regarding Tax Ramifications of Investments and answers to investors' frequently asked questions regarding taxes, review same, and strategize regarding same (.4); emails with C. Perez and financial advisor regarding additional questions from investors regarding their IRA funds invested with Drive Planning and email from financial advisor regarding same (.2).

09/03/2024

[Asset Analysis and Recovery]: Discuss with C. Perez issues related to tax liens purportedly purchased by Drive Planning and searching for same and providing information to investors, and provide direction to team regarding same (.3); discuss with R. Landy finalizing Warranty Deed to be signed by investor to effect turnover of condo in St. Petersburg and preparation of Purchase and Sale Agreement to transfer ownership of entity with interest in Mexican condo, and follow with C. Perez regarding same (.2); review American Express's response to Subpoena providing information regarding payment service processors, emails with team regarding same, and coordinate preparation and sending subpoenas to same (.2); review notices from insurance company regarding premiums due for insurance policies for Burkhalter's vehicles, umbrella policy, and accidental death policy, emails with team regarding same,

KDM 1.90 \$395.00 - \$750.50

and prepare and send email to counsel for Burkhalter regarding same (.3); emails with A. Pavon regarding status of obtaining proposals from insurance agent for uninsured properties and proposals from potential realtors for Florida properties (.2); emails with A. Pavon and noteholder for the store on the ranch in Georgia regarding certain provisions of the note, confirming the upcoming monthly payment amount, the amounts previously paid by Drive Planning, the amortization schedule, and related matters, email from counsel for noteholder regarding the amount of the next payment, email from A. Pavon regarding their miscalculation of monthly payments, need for additional information from noteholder or counsel, and related matters, review note, and provide direction regarding further communications with counsel (.5); email from A. Pavon to the ranch managers regarding the cattle and equipment that is insured and confirming no other valuable assets need to be insured, review insurance policy, and provide input regarding same (.2).

09/03/2024

[Business Operation]: Discuss with J. Bowman and C. Perez various matters related to renovation, marketing for rent, and strategy for sale of units in St. Petersburg and provide direction regarding same (.3); strategize with C. Perez regarding proposed realtor for commercial properties in Florida and provide direction regarding negotiating commission rates and marketing units for sale (.2); emails with L. Scruggs and social media consultant regarding preservation of social media accounts, login credentials to access and download records and information, and related matters, and provide direction regarding same (.2); emails with L. Scruggs and A. Pavon regarding downloading of certain records and issues with logging into social media accounts and provide direction regarding resolving issues (.2); emails with L. Scruggs and website manager regarding preservation of website, login credentials to access and download same, and other information and records to request from website manager (.2); receive hard drive of forensic image of J. Edwards's computer, discuss with team, and coordinate uploading to document management platform (.1); emails and discuss with A. Pavon invoices from Google for Google

KDM 2.20 \$395.00 - \$869.00

	Drive account for purposes of maintaining and preserving email accounts and contents therein, review invoices, confirm payment deadlines, and provide direction regarding communications with Google representative regarding same, preserving all data, and reducing cost of account (.3); email from J. Burkhalter forwarding estimate for landscaping and related work on the ranch and near event space, review estimate, emails with A. Pavon regarding same, and coordinate confirming scope of work and related matters with J. Burkhalter (.2); emails with J. Burkhalter and A. Pavon regarding rodeo hosted on the ranch, costs of same, need for fundraising, and challenges with same in light of enforcement action (.1); emails with A. Pavon and event planners regarding the Monster Ball and Rodeo, the costs for same, additional challenges, and related matters and scheduling meeting to further discuss (.2); emails with A. Pavon regarding her assessment of financial information for Club 201 provided for the previous weeks, provide input regarding same, and coordinate contacting J. Bowman to obtain additional information (.2).					
09/03/2024	[Business Operation]: Communication with forensic company and Kenny regarding website invoices (.5); communication with forensic company and Kenny regarding services and pricing (.2); communication with website administrator regarding invoices (.8); download social media files (.4); and communication with Adriana Pavon regarding social media information (.1).	LS	2.00	\$275.00	25.0%	\$412.50
09/03/2024	[Asset Analysis and Recovery]: Attention to property management issues, payroll issues and taking control of St. Petersburg properties.	СРМ	2.30	\$375.00	-	\$862.50
09/03/2024	[Case Administration]: Respond to investor inquiries by telephone and email.	СРМ	1.40	\$375.00	-	\$525.00
09/03/2024	[Case Administration]: Review of Hanston v. Drive Planning docket to determine deadline and discussion with K. Murena regarding same.	AP	1.80	\$250.00	-	\$450.00
09/03/2024	[Asset Analysis and Recovery]: Email exchange with K. Greene requesting insurance quote for multiple properties.	AP	0.10	\$250.00	-	\$25.00

09/03/2024	[Asset Analysis and Recovery]: Email exchange and telephone call with W. McNelley regarding mortgage on 10091 Blue Ridge Drive.	AP	0.30	\$250.00	-	\$75.00
09/03/2024	[Business Operation]: Access Docu-sign of M. Cagle and void over 440 Docu-sign agreements being sent to investors requiring expiring contracts (1.4); brief review of documents in google drive pertaining to G. Linarducci (0.3).	АР	1.70	\$250.00	-	\$425.00
09/04/2024	[Asset Analysis and Recovery]: Review and revise motion to employ Captain Brooks and proposed order on same (0.3); confer with Receiver regarding recovery of property (0.1); review and analyze several emails regarding website, loans due to Drive Planning, and recovery of real estate (0.2); work on recovery of Bradford property (0.2).	RML	0.80	\$395.00	-	\$316.00
09/04/2024	[Asset Disposition]: [Lauren King] Draft response to yacht broker in preparation of selling repossessed yacht.	pl	0.20	\$100.00	100.0%	\$0.00
09/04/2024	[Business Operation]: Email from J. Burkhalter regarding rent from house owned by a relief defendant, opening account in name of that defendant for depositing rental income and paying expenses, and issues with credit card for property used to maintain it, discuss with A. Pavon, and provide direction regarding opening new account for entity that owns property (.2); emails with J. Burkhalter and discuss with A. Pavon issues related to properties of J. Burkhalter and her parents and income from same (.2) emails with counsel for J. Burkhalter regarding the foregoing matters and further discuss with A. Pavon (.2); emails with J. Burkhalter and A. Pavon regarding advertising expenses for barn and store, credit card previously used for same, paying future expenses from accounts for barn and store, and telephone call with A. Pavon regarding same (.2); emails with J. Burkhalter and A. Pavon regarding various issues related operating the ranch, the store, and the barn/event space, potential upcoming events at the barn, expenses for operating all businesses, bank accounts, credit cards, and debit cards, and related matters (.4); telephone calls with A. Pavon regarding same, monitoring operations and finances of the businesses, and strategy for	KDM	2.60	\$395.00		\$1,027.00

	maintaining or increasing their value and marketing them for same, and provide direction regarding locating other realtors to submit proposals for same (.5); emails with L. Scruggs regarding website development agreement and invoices for Drive Planning's website, review same and confirm preservation of website pages and date, and telephone call with L. Scruggs regarding same and website manager's outstanding invoices and asserting claim for same through eventual claims process (.2); discuss with C. Perez issues with handyman's turnover of keys, fobs, and truck to administrator for the Florida properties, his final paycheck, and his claimed outstanding expenses, provide direction regarding further communications with handyman, and exchange emails with counsel for Burkhalter regarding same (.3); emails with counsel regarding certain terms of St. Petersburg office lease and bases for cancelling same, review lease renewal, and provide direction for communications with landlord (.2); emails with financial advisor regarding uncashed checks retrieved from office, proposed disposition of same, and related matters, and coordinate sending to our office to address, void, return, or cash as appropriate (.2).					
09/04/2024	[Asset Disposition]: Emails with A. Pavon and G. Hays regarding proposed realtor, his inspection of the ranch and forthcoming proposal, and scheduling call to meet realtor and discuss strategy and proposal.	KDM	0.20	\$395.00	-	\$79.00
09/04/2024	[Employment Application]: Review and revise Motion to pay yacht captain and other expenses to maintain yacht and proposed Order granting same, and send to counsel to confirm certain revisions (.4); email from R. Landy confirm no further revisions are necessary, prepare and send email to SEC counsel forwarding Motion and Order, providing explanation of same, and requesting they confirm their position on same, and coordinate sending to counsel for Burkhalter and counsel for Relief Defendants to confirm their positions (.3).	KDM	0.70	\$395.00	-	\$276.50
09/04/2024	[Case Administration]: Further emails with financial advisor regarding final revisions to be made to comprehensive memorandum regarding tax ramifications of investments and frequently asked questions and	KDM	2.20	\$395.00	-	\$869.00

answers, and simple version of same, to be provided to investors and discuss with C. Perez (.2); further emails with Synovus Bank regarding the ICS forms for purposes of FDIC insurance on all funds in fiduciary account and timing of opening accounts and discuss with team (.2); multiple emails with L. Scruggs and IT vendor regarding the proposal for imaging laptops and issues related to uploading forensic images to document management platform, review proposal and confirm certain details regarding same, execute proposal, purchase and ship hard drives to financial advisors office for purposes of forensic imaging, and providing direction regarding timing and logistics of imaging (.5); emails with R. Landy and counsel for plaintiffs in two actions filed against Drive Planning in Florida state court and emails regarding same (.2); emails with receivership website manager regarding the website hosting and domain names and invoices for same, review same and status of the website, and coordinate payment (.2); emails with CNB regarding documents to be signed to open fiduciary accounts, review and execute same, and discus with team timing of opening account to which funds from Chase account will be deposited (.3); emails with Axos Bank regarding additional forms to sign to open fiduciary account, review and execute forms, and receive confirmation of opening account with account information (.4); emails with financial advisor regarding documents they recovered and scanned from Blue Ridge and Avalon properties and status of scanning and sending remaining documents, emails with team regarding same, and coordinate uploading same to document management platform (.2).

09/04/2024 **KDM** [Asset Analysis and Recovery]: Emails with team regarding investigating joint venture project in Colombia and provide direction regarding same (.2); email from A. Pavon providing information regarding Drive Planning's involvement in project in Colombia and further investigation required, discuss with C. Perez, and provide input regarding same (.3); emails with A. Pavon and insurance agent regarding renewing the insurance on the yacht and certain information required for same and provide input regarding same (.2); review updated list of all Georgia properties and discus with

KDM 3.20 \$395.00 - \$1,264.00

A. Pavon various issues related to same (.4); discuss with C. Perez status of finalizing Warranty deed to convey St. Petersburg condo to estate, issues related to condo association and status of payment of maintenance fees, and status of preparation of Purchase and Sale Agreement for entity that owns portion of Mexican condo, and strategize regarding same (.2); send email to counsel for advisor regarding information needed for deed and related to condo association, and emails with R. Landy regarding same and his finalizing deed (.2); emails with A. Pavon and R. Landy regarding search for mortgage on property owned by advisor against which Drive Planning holds a note and coordinate preparation of Notice of Lis Pendens (.2); emails with financial advisor, A. Pavon, and insurance agent regarding confirming coverage for certain insurance policy and payment of premium for same, review declaration pages of policy, and requesting instructions for making payment (.3); email from counsel for advisor providing information needed for Deed to transfer condo to Estate, information related to condo association and payment of maintenance, and information related to Mexican condo, insert information into the Deed, strategize regarding other issues, and coordinate addressing issues with Mexican condo (.3); email from R. Landy confirming no further revisions to the Deed are necessary (.1); email from counsel for investors providing information regarding real properties to investigation, strategize regarding same, and coordinate contacting professionals with information regarding the properties (.3); emails with C. Perez regarding proposal from contract for the work to be done to various units at the Pearson property, review proposal, and strategize regarding same (.2); emails with financial advisor regarding promissory note for loan to individual and related documents regarding purchase of properties, review documents, and coordinate preparing demand letter and investigating mortgage on the property (.3).

09/04/2024

[Case Administration]: Communication with forensic IT company regarding agreement (.3); document review and search (.9); and communication with website administrator regarding invoices and forensic IT company regarding final questions from Kenneth

LS 1.60 \$275.00 25.0% \$330.00

	Murena about terms of agreement (.4).				
09/04/2024	[Asset Analysis and Recovery]: Email exchange with K. Murphy of Marina Insurance Advisor to discuss insurance on Live More Yacht and provide background on receivership (.2); create and continued revisions of target list, including review of commission reports for same (.7); review of Drive Planning documents to obtain information on Medellin Hotel investment with review of wire confirmations, collateral background, and various emails regarding same for forward to Receiver (.9); email exchange with M. Laughlin Allen regarding subpoena to Truist (.1); public records search of mortgage on 100 1st Ave., N. and email exchange with K. Murena regarding same (.2); telephone call and email exchange with K. Greene regarding new insurance quotes (.1); draft notices of lis pendens on Florida and Georgia properties (1.2); continued review of J. Edwards email to obtain background on various assets, including obtaining lease agreements for Georgia properties (.5).	AP	3.90	\$250.00	- \$975.00
09/04/2024	[Case Administration]: Respond to investor inquiries by email and telephone call (3.2); and update FAQ and posts on Receivership website (1.5).	CPM	4.70	\$375.00	- \$1,762.50
09/04/2024	[Asset Analysis and Recovery]: Attention to issues concerning remodeling of St. Petersburg properties, estimate from contractor and payment of outstanding amounts.	СРМ	2.30	\$375.00	- \$862.50
09/04/2024	[Business Operation]: Draft motion to employ Lance Brooks as Live Yacht Captain and order regarding same (1.0); telephone call with Mark of Burkhalter Ranch discussing potential sale of cattle and equipment (.2); email exchange with J. Burkhalter regarding Drive Properties LLC and income of same (.2); receipt and review of pay records from Club 201 at the Detroit (.2); receipt and review of payroll for Staurolite Barn, TBR Supply House, and Burkhalter Ranch and discussions with J. Burkhalter regarding same (.6).	AP	2.20	\$250.00	- \$550.00
09/04/2024	[Asset Analysis and Recovery]: Research into J. Burkhalter's Drive Planning Real Estate e-mail to gather additional information on properties (.3); revise property list (.2).	АР	0.50	\$250.00	- \$125.00

09/04/2024	[Case Administration]: Work on litigation of New Hampshire case.	RML	0.10	\$395.00	-	\$39.50
09/04/2024	[Business Operation]: Review and analyze Expansive agreement and email from Expansive regarding termination and work on response strategy.	RML	0.30	\$395.00	-	\$118.50
09/04/2024	[Case Administration]: [Lauren King] Review documents regarding New Hampshire court case and draft email to local counsel in New Hampshire to arrange filing of notice of receivership.	pl	0.30	\$100.00	100.0%	\$0.00
09/04/2024	[Asset Disposition]: Email exchange with G. Hays regarding realtor for Mineral Bluff area.	AP	0.10	\$250.00	-	\$25.00
09/04/2024	[Business Operation]: Email exchange with Jocelyn Shook of Expansive to discuss cancellation of contract and e-mail exchange with R. Landy and K. Murena regarding same (.1); review of expansive contract to determine cancellation policy (.2).	АР	0.30	\$250.00	-	\$75.00
09/05/2024	[Asset Analysis and Recovery]: Email exchanges with K. Greene regarding new insurance and past due payments and discuss with Receiver (.2); review of tax dues for 13562 E 11th Street and discuss with Receiver (.2); email exchanges with K. Murena summarizing payment for commercial liability policy (.2); email exchange with Coinbase to provide wire instructions (.1); email exchange with VP Commercial Real Estate Services to obtain legal description for properties to complete Notices of lis pendens (.1); draft and finalize Notices of Lis Pendens for Florida properties (2.8); email exchange with R. Landy discussing St. Petersburg lease termination and strategize regarding same (.2); run and review of multiple ADP reports to determine broker payments and commission reports for bank reconstruction and target list (.6).	AP	4.40	\$250.00	-	\$1,100.00
09/05/2024	[Asset Analysis and Recovery]: Call with Kurt Davis regarding Magruder and Hansen case and resolution of dispute concerning stay.	RML	0.20	\$395.00	-	\$79.00
09/05/2024	[Asset Analysis and Recovery]: Prepare a subpoena tracking chart and update with status of service and responses.	jas	0.70	\$100.00	25.0%	\$52.50

09/05/2024	[Case Administration]: Call from and email exchange with Nathan Fennesy regarding New Hampshire case (0.2).	RML	0.20	\$395.00	-	\$79.00
09/05/2024	[Asset Analysis and Recovery]: Emails with A. Pavon regarding the Georgia properties and operations covered by a particular policy, review documents regarding same, and telephone call and emails with insurance agent regarding payment of premium (.5); discuss with A. Pavon opening of fiduciary account for purposes of depositing proceeds of liquidation of cryptocurrencies, provide wire instructions and coordinate sending to Coinbase and Chase to send funds to the Estate, and review emails with Coinbase regarding and Chase regarding same (.3); confirm receipt of funds from Coinbase, discuss with A. Pavon, and emails with Coinbase confirming same (.2); discuss with R. Landy homestead issue related to property to be deeded to the Estate, and related issues, revise Warranty Deed, and send to counsel for advisor for purposes of executing same (.3); telephone call from contractor working on property in Indianapolis, emails with my counsel regarding same, and provide direction regarding communications with same (.2); emails with A. Pavon and lender for TRB Supply Store regarding calculation of monthly payments due under Note and whether any provision restrict sale of the Store, and discuss with team (.2); emails with A. Pavon regarding same (.2); emails with A. Pavon and potential realtor for the Georgia properties regarding the legal descriptions for various properties and emails with A. Pavon regarding preparation of Notices of Lis Pendens for certain properties (.2); email from C. Perez and A. Pavon regarding same, and provide direction regarding investigation of same (.2).	KDM	2.30	\$395.00	-	\$908.50
09/05/2024	[Case Administration]: Multiple emails with Synovus Bank regarding opening of account, initial deposit to fund the account, and online access, and set up online access with new password (.5); emails and telephone calls with CNB regarding	KDM	1.50	\$395.00	-	\$592.50

opening and initial funding of the fiduciary accounts, including operating checking account, review documentation with account information and wiring instructions, and discuss with team (.3); emails with Axos Bank regarding wet signature required for authorized signer, review and sign form, send to bank, and emails and discuss with bank and team status of fiduciary account and timing of initial deposit (.3); work on setting up online access to fiduciary account at Axos Bank and multiple emails with bank regarding same and the ICS protection provided through account (.4).

09/05/2024 [Asset Disposition]: Emails with proposed **KDM** 3.10 \$395.00 \$1,224.50 realtors for the Georgia properties regarding upcoming Zoom meeting and presentation and various material to review for same including proposal, marketing strategy and analysis, assessment and recommendations for the various properties, and related matters and review same in advance of meeting (.5); attend Zoom call with proposed realtors and G. Hays to discuss the foregoing and related matters including commission rates and possible discount and discuss with A. Pavon and R. Landy same and related matters (1.5); discuss with C. Perez condo/ timeshare on Ana Maria Island, building procedures, status of rental, and proposed realtor for same, and provide input regarding negotiation of commission rates (.3); emails with A. Pavon regarding proposals from two proposed realtors for Florida Properties and agreement to reduce commission rates, review proposals, and coordinate scheduling Zoom meetings with each realtor (.4); email from investor regarding her involvement with Drive Planning, the properties to be sold in Georgia, and her recommendations for realtors and emails with A. Pavon and C. Perez regarding same (.2); email from potential realtor for Georgia properties regarding issues discussed during Zoom meeting and proposal with reduced commission rates, review same, and strategize regarding same (.2). 09/05/2024 [Employment Application]: Emails with SEC **KDM** 0.50 \$395.00 \$197.50 counsel confirming no objection to the proposed Motion to authorize payments to yacht captain and expenses to maintain the yacht until it is sold and the likely timing of

	selling the yacht and emails with R. Landy same and confirming positions of Burkhalter and Relief Defendants (.2); prepare and send email to counsel for Burkhalter and counsel for Relief Defendants regarding same, emails from counsel confirming no objections, discuss with R. Landy, and update and coordinate finalizing and filing Motion (.3).					
09/05/2024	[Business Operation]: Discuss with C. Perez issues with terminated handyman's dropping off keys and fobs to various units and delivering truck to one of the Estate's properties (.2); telephone calls with handyman regarding same, timing of his last paycheck, and his request for reimbursement of various expenses and further discuss with C. Perez (.3); emails and discuss with C. Perez and A. Pavon regarding payroll for J. Bowman and final paycheck for handyman, and provide direction regarding same (.2); emails and discuss with A. Pavon various matters regarding operations of the ranch, the store, and the barn, whether certain proposed events can go forward, and related matters, and provide direction regarding same (.5); receive debit card for administrator of Florida properties to use for minor purchases for properties, emails with administrator regarding same, and coordinate sending to administrator (.2); further discuss with A. Pavon certain proposed events at the ranch including rodeo and Monster Ball and issues with funding same and review emails with A. Pavon, ranch managers, and/or organizer of events regarding same (.3); review payroll runs for the ranch, store and barn, and emails with A. Pavon and landlord for Georgia office space regarding cancellation of lease and discuss with team same and status of cancellation of other office leases (.2).	KDM	2.10	\$395.00		\$829.50
09/05/2024	[Case Administration]: Document review and organization (.2); document search and download of production (1.7); take screenshots of website (1.0); and update document list (.2).	LS	3.10	\$275.00	25.0%	\$639.37
09/05/2024	[Case Administration]: Work on updating website for investors (1.2); respond to inquiries from investors by email and telephone (1.6); work with Stretto on	СРМ	4.10	\$375.00	-	\$1,537.50

	platform for investor document upload (1.3).					
09/05/2024	[Asset Analysis and Recovery]: Emails regarding take control of St. Petersburg and Holmes Beach property and access to same (1.6); review lease and deal with tenant issue (1.0); and cause turnover and inspection of truck owned by Relief Defendant and driven by former handyman for property (2.0).	СРМ	4.60	\$375.00	- \$1,7	25.00
09/05/2024	[Business Operation]: Email exchange with J. Burkhalter regarding South State Bank status (.1); Run payroll for employees (.3); telephone call with J. Burkhalter regarding farm operations, upcoming events, and review of payment instructions (.5); email exchange with J. White of Great American Rodeo company to discuss inability to sponsor event (.1); email exchange with S. Cook discussing Monster Ball and funding of same (.1); email exchange with W. McNelley regarding unpaid loan for 10091 Blue Ridge and brief continued calculation of same (.2); review of payroll for TBR Supply House and Burkhalter Ranch (.2).	АР	1.50	\$250.00	- \$3	75.00
09/05/2024	[Asset Disposition]: Telephone call with J. Hansen of Coldwell Realty to discuss commissions (.2); review of proposal from Global Luxury Realty, LLC (.1); telephone call with Jason from Spritzer Rutland regarding real estate proposal (.2).	АР	0.50	\$250.00	- \$1	25.00
09/05/2024	[Asset Disposition]: Work on securing yacht sale.	RML	0.10	\$395.00	- \$	39.50
09/05/2024	[Asset Analysis and Recovery]: Work on return of Bradford condominium.	RML	0.10	\$395.00	- \$	39.50
09/05/2024	[Business Operation]: Review and revise response regarding office lease.	RML	0.10	\$395.00	- \$	39.50
09/06/2024	[Asset Analysis and Recovery]: Review and analyze email regarding information from investor regarding potential targets for recovery (0.1); review and analyze order approving payments to Captain Brooks and draft email to Captain Brooks regarding Yacht maintenance (0.2).	RML	0.30	\$395.00	- \$1	18.50
09/06/2024	[Asset Analysis and Recovery]: Research Georgia law regarding assignment and/or transfers of membership interest and LLC statute, and draft assignment agreement, unanimous consents of members, meeting notices and required documents for	CPM	7.80	\$375.00	- \$2,9	25.00

	Receiver and Bradfords to sign regarding					
	transfers of certain property interest.					
09/06/2024	[Employment Application]: Review Order granting Motion to authorize payment to yacht captain and to maintain yacht until it is sold and emails with R. Landy and captain regarding same, timing and procedures for sending August and future payments, and outstanding expenses to be reimbursed.	KDM	0.20	\$395.00	-	\$79.00
09/06/2024	[Case Administration]: Further emails with SEC counsel regarding recover of proceeds of sale of cryptocurrencies from Coinbase (.1); telephone call with counsel for SEC regarding the status of gaining control of, compiling, and organizing all records of Drive Planning from various sources for purposes of production to SEC, issues related to imaging, preserving and reviewing records, document management platform, various asset recovery efforts, real properties and strategy for marketing same for same, proposed realtors, claims against third parties, status and strategy for recovering assets from third parties, and related matters (.5); emails with J. Serna regarding confirmation of all Misc. actions filed and two that still need to be filed and provide direction regarding same and having Georgia counsel file one in S.D. Ga. (.2); emails with Axos Bank regarding final documents needed to initial wires and other transfers from fiduciary account, review and sign same, and emails with Axos Bank regarding same (.2); emails with financial advisor and forensic accountant regarding the status of various matters they are working on including preparing the account reconstruction, the tax memorandum and frequently asked questions and answers to provide to investors, investigation of gun store, timing of forensic imaging of computers, shipment of Blueridge documents and checks to my office, shipment of contents of storage, and other matters and provide direction regarding same (.5); send email to L. Scruggs regarding scheduling TransPerfectLegal to meet at financial advisor's office to image the computers and the status of uploading all records to document management platform and send email to A. Pavon regarding granting access to various sources of records including DocuSign, ADP, and Google Workspace (.1).	KDM	1.60	\$395.00		\$632.00

09/06/2024	[Asset Disposition]: Emails with counsel for Burkhalter and with C. Perez regarding the handyman's delivery of the pickup truck to one of the properties, the title owner of the truck, and the proposed sale of same, and emails with C. Perez regarding the plan for the sale certain legal and administrative matters related to same (.3); emails and telephone call with real estate auction company regarding the services they provide to receivers for purposes of selling assets and review website to investigate same (.3).	KDM	0.60	\$395.00	- \$237.00
09/06/2024	[Business Operation]: Emails with J. Bowman regarding various matters related to Florida properties, the debit card for operational expenditures, and related matters, and emails with C. Perez regarding same (.2); further emails with landlord for Georgia office and A. Pavon regarding our request for cancellation of least and additional documents requested by legal department and further discuss with team (.2); emails with A. Pavon regarding EINs for the Relief Defendants, review tax forms confirming same, and discuss with team administrative issues related to the ranch and the store (.2); emails with financial advisor regarding his further investigation of outdoor-gun store, upcoming grand opening, rent to be paid to Drive Planning, and contacting individual with ownership interest in store, and emails with my counsel regarding same (.2).	KDM	0.80	\$395.00	- \$316.00
09/06/2024	[Asset Analysis and Recovery]: Work with Truist Bank to effect wire transfers of funds of the Estate to three different fiduciary accounts at Axos Bank, CNB, and Synovus Bank, addressing various administrative matters, signing required documentation, multiple communications with those banks regarding same and confirming receipt of transfers in the fiduciary accounts, and discuss with team (2.7); emails with legal department of Chase Bank regarding status and timing of transfer of funds to fiduciary account at CNB, discuss with team, and emails with CNB regarding same (.2); emails with forensic accountant regarding records needed from banks at which the stores maintained accounts for purposes of investigation of transfers to the stores and determining their values of the businesses and emails with A. Pavon regarding same and Subpoenas to banks (.3); emails with	KDM	3.90	\$395.00	- \$1,540.50

	financial advisor regarding investigation of outdoor/gun shop in which Drive Planning has ownership interest, its inventory, whether UCCs were filed for same, and related matters, and strategize with team regarding further investigation of same (.3); emails with financial advisor regarding engagement letter from law firm to Burkhalter and Bradford and investigation of involvement with Drive Planning, review letter, and coordinate preparation of Subpoena to firm (.2); email from financial advisor forwarding documents and information regarding house in Georgia and severance payment from Drive Planning to individual for work done related to the Ranch, review documents, and emails with counsel regarding same (.2).					
09/06/2024	[Case Administration]: Communication with forensic company (.8); check production from opposing counsel's document management company against email information we retained from company (.5); and Document review and search (3.3).	LS	4.60	\$275.00	25.0%	\$948.75
09/06/2024	[Asset Analysis and Recovery]: Search drive for background on Ketler Bosse and email exchange with R. Landy regarding same (.2); draft demand letter to TBR Outdoors (.6); review of correspondence in J. Edwards Drive Planning inbox regarding potential sources of recovery (.2); email exchange with A. Laughlin regarding subpoena and demand letter (.1).	АР	1.10	\$250.00	-	\$275.00
09/06/2024	[Business Operation]: Obtain EIN for Jackie & Co, TBR Outdoor Supply, Drive Gulfport, Drive Real Estate LLC, and the Burkhalter Ranch.	AP	0.20	\$250.00	-	\$50.00
09/06/2024	[Asset Disposition]: Email exchange with C. Murena regarding sale of vehicle.	AP	0.10	\$250.00	-	\$25.00
09/07/2024	[Asset Analysis and Recovery]: Emails with forensic accountant regarding the records required from banks and J. Edwards's computer for purposes of preparation of account reconstruction and the processing and search of forensic image of her computer and provide direction to team regarding searching for required records (.3); email from C. Perez regarding draft Assignment of Membership Interests in company that co-owns the Mexican condo unit with Drive Planning, draft Unanimous Consent of Members, draft Corporate	KDM	1.10	\$395.00	-	\$434.50

Resolutions, draft Meeting of the Members, and other documents, discuss with C. Perez, review and revise same, and send to R. Landy for input (8). 19/08/2024 [Asset Analysis and Recovery]: Review and analyze emails from Captain Brooks, review yacht maintenance expenses and confer with Receiver regarding same (0.2); review and revise letter to Jon Clement regarding TBR Outdoor properly and demand for rent (0.1); review and revise assignment of membership interest in MAH International LLC to the estate to take control of Mexican Condo until (0.3). 19/08/2024 [Asset Analysis and Recovery]: Emails with R. Landy regarding further revisions to the Assignment of Membership Interests and Withdrawal as Members of company that owns interest in Mexican condo, review revisions, make further revisions, and send to counsel for advisor for review and execution, with explanation regarding same (5); emails with R. Landy and Yacht Captain regarding his wire instructions for monthly payments and his request for reimbursement of outstanding expenses, review invoice of expenses, and coordinate sending wite for pay and expenses (2). 19/08/2024 [Business Operation]: Review and revise letter to principal of outdoor/gun store operating on property owned by Drive Planning notifying store of Receivership, providing Receivership Order, and demand payment of rent and documents reflecting agreement to occupy property, emails with R. Landy and A. Pavon regarding same, and emails with G. Hays regarding same, and emails with G. Hays regarding same, and emails with G. Hays regarding same, and related matters. 19/08/2024 [Asset Disposition]: Emails with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (3); emails with G. Hays regarding one Georgia realor's agreement to occupy property, emails with to Propersing further discuss with the discuss with team (2). 19/09/2024 [Case Administration]: Draft next mass email to investors in English and in Spanish							
analyze emails from Captain Brooks, review yacht maintenance expenses and confer with Receiver regarding same (0.2); review and revise letter to Jon Clement regarding TBR Outdoor property and demand for rent (0.1); review and revise assignment of membership interest in MAH International LLC to the estate to take control of Mexican Condo unit (0.3). 09/08/2024 [Asset Analysis and Recovery]: Emails with R. Landy regarding further revisions to the Assignment of Membership Interests and Withdrawal as Members of company that owns interest in Mexican condo, review revisions, make further revisions, and send to counsel for advisor for review and execution, with explanation regarding same (.5); emails with R. Landy and Yacht Captain regarding his wire instructions for monthly payments and his request for reimbursement of outstanding expenses, review invoice of expenses, and coordinate sending wire for pay and expenses (.2). 09/08/2024 [Business Operation]: Review and revise letter to principal of outdoor/gun store operating on property owned by Drive Planning notifying store of Receivership, providing Receivership Order, and demand payment of rent and documents reflecting agreement to occupy property, emails with R. Landy and A. Pavon regarding same and related matters. 09/08/2024 [Asset Disposition]: Emails with C. Perez and amalis with G. Hays regarding same and investor regarding recommendations for realtors for the sale of the Georgia properties, further discuss with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (.3); emails with C. Hays regarding one Georgia realtor's agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement and discuss with team (.2).		and other documents, discuss with C. Perez, review and revise same, and send					
R. Landy regarding further revisions to the Assignment of Membership Interests and Withdrawal as Members of company that owns interest in Mexican condo, review revisions, make further revisions, and send to counsel for advisor for review and execution, with explanation regarding same (.5); emails with R. Landy and Yacht Captain regarding his wire instructions for monthly payments and his request for reimbursement of outstanding expenses, review invoice of expenses, and coordinate sending wire for pay and expenses (.2). 109/08/2024 [Business Operation]: Review and revise letter to principal of outdoor/gun store operating on property owned by Drive Planning notifying store of Receivership, providing Receivership Order, and demand payment of rent and documents reflecting agreement to occupy property, emails with R. Landy and A. Pavon regarding same, and emails with G. Hays regarding same, and related matters. 109/08/2024 [Asset Disposition]: Emails with C. Perez and investor regarding recommendations for realtors for the sale of the Georgia properties, further discuss with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (.3); emails with G. Hays regarding one Georgia realtor's agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement and discuss with team (.2).	09/08/2024	analyze emails from Captain Brooks, review yacht maintenance expenses and confer with Receiver regarding same (0.2); review and revise letter to Jon Clement regarding TBR Outdoor property and demand for rent (0.1); review and revise assignment of membership interest in MAH International LLC to the estate to take	RML	0.60	\$395.00	-	\$237.00
letter to principal of outdoor/gun store operating on property owned by Drive Planning notifying store of Receivership, providing Receivership Order, and demand payment of rent and documents reflecting agreement to occupy property, emails with R. Landy and A. Pavon regarding same, and emails with G. Hays regarding same and related matters. O9/08/2024 [Asset Disposition]: Emails with C. Perez and investor regarding recommendations for realtors for the sale of the Georgia properties, further discuss with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (.3); emails with G. Hays regarding one Georgia realtor's agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement and discuss with team (.2). O9/09/2024 [Case Administration]: Draft next mass CPM 2.70 \$375.00 - \$1,012.50	09/08/2024	R. Landy regarding further revisions to the Assignment of Membership Interests and Withdrawal as Members of company that owns interest in Mexican condo, review revisions, make further revisions, and send to counsel for advisor for review and execution, with explanation regarding same (.5); emails with R. Landy and Yacht Captain regarding his wire instructions for monthly payments and his request for reimbursement of outstanding expenses, review invoice of expenses, and coordinate	KDM	0.70	\$395.00	-	\$276.50
and investor regarding recommendations for realtors for the sale of the Georgia properties, further discuss with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (.3); emails with G. Hays regarding one Georgia realtor's agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement and discuss with team (.2). 09/09/2024 [Case Administration]: Draft next mass CPM 2.70 \$375.00 - \$1,012.50	09/08/2024	letter to principal of outdoor/gun store operating on property owned by Drive Planning notifying store of Receivership, providing Receivership Order, and demand payment of rent and documents reflecting agreement to occupy property, emails with R. Landy and A. Pavon regarding same, and emails with G. Hays regarding same	KDM	0.40	\$395.00	-	\$158.00
·	09/08/2024	and investor regarding recommendations for realtors for the sale of the Georgia properties, further discuss with C. Perez, and follow up on scheduling calls with same to discuss their interest and proposals (.3); emails with G. Hays regarding one Georgia realtor's agreement to reduce commission rates and whether any potential buyer's already contacted us for purposes of preparing listing agreement and discuss	KDM	0.50	\$395.00	-	\$197.50
	09/09/2024		СРМ	2.70	\$375.00	- \$	31,012.50

	and document request to same and work with stretto unsecure portal.					
09/09/2024	[Asset Analysis and Recovery]: Review and analyze several emails regarding insurance on Gulfport Properties.	RML	0.20	\$395.00	-	\$79.00
09/09/2024	[Asset Analysis and Recovery]: Review and analyze email from Joshua A. Mayes, counsel for David Bradford and confer with Receiver regarding same (0.1); review and analyze Kevin and Kathryn Elkins Deed of Trust and promissory note regarding 123 Coles Crossing, Mineral Bluff and review and revise demand letter (0.3).	RML	0.40	\$395.00	-	\$158.00
09/09/2024	[Case Administration]: Continue to update investor contact list.	jas	0.20	\$100.00	25.0%	\$15.00
09/09/2024	[Asset Analysis and Recovery]: Emails and telephone call with counsel for various investors regarding the receivership, potential claims against third parties and advisors, and related matters, and discuss with my counsel (.9); emails and telephone call with counsel for other group of investors regarding claims against third parties, communications with counsel for advisors, gathering documents from various sources, asset recovery efforts, and various other matters (.8); further emails with counsel for investors regarding proposed expert for action against one advisor and request for various financial records of Drive Planning, and discuss with team (.2); emails with Chase Bank regarding the method and timing of transfer of account balance to the Estate and discuss with team same and status of obtaining records from bank in response to Subpoena (.2); emails with A. Pavon and insurance agent regarding status of reinstating insurance policy that expired pre-receivership, confirming receipt of premium payment, and setting up automatic payments going forward and discuss with team (.2); emails with A. Pavon and M. Koch regarding inspections and mitigation reports needed to obtain insurance policies on uninsured properties and provide input regarding same (.2); strategize with counsel regarding claims against certain financial institutions (.2); emails with new counsel for one advisor regarding his representation for purposes of SEC action and the Deed and Assignment sent to advisor's general counsel, emails with R. Landy regarding	KDM	4.80	\$395.00	-	\$1,896.00

same, and strategize regarding same (.3); multiple emails with insurance agent and A. Pavon regarding premium payment for insurance policy for one Florida property, discuss with A. Pavon and review documents regarding policy, work on setting up payment from fiduciary account, and emails with insurance company regarding same (.4); emails with City National Bank regarding same and moving funds to checking account to pay insurance and other expenses (.1); emails with A. Pavon and Coinbase regarding status and timing of production of documents requested in demand letter and discuss with team (.2); emails with C. Perez and L. Scruggs regarding investigation of transfer of funds to foreign country and information provided by investor, review various documents regarding same, and strategize with counsel regarding same and further investigation (.4); emails with counsel and forensic accountant regarding wire transfer confirmations located among Drive Planning's records and J. Edwards's computer, other searches for same, status and timing of receiving all wire transfer confirmations from Truist Bank in response to Subpoena, and status of reconstruction of accounts, and further discuss with team (.3); further emails with forensic accountant regarding same, issues related to reconstruction, timing of imaging all Drive Planning computers, and related matters (.2); emails with A. Pavon and forensic accountant regarding bank records for the stores to confirm amounts transferred to them and related matters and provide input regarding further investigation of same (.2).

09/09/2024

[Case Administration]: Multiple emails with Axos Bank regarding gaining online access to fiduciary account and related administrative matters and scheduling training session for secure online portal and software and required forms for same, work on setting up secure login credentials and protocols, and access account to confirm balance and available online banking resources (.4); emails from investors and discuss with C. Perez her communications with investors and the status of finalizing the investor portal through Stretto for purposes of uploading their records and information (.5); emails with J. Serna regarding issues with the filings of Misc. actions in certain jurisdictions and the Misc.

KDM 2.10 \$395.00 - \$829.50

actions to be commenced in two particular jurisdictions, coordinate sending Notices of Complaint and Appointment Order to two attorneys in those jurisdictions to file Notices, and review emails with those attorneys regarding same (.3); emails and discuss with L. Scruggs regarding status and timing of IT vendor's imaging computers retrieved from Georgia office. and status of finalizing agreement with document management company for purposes of uploading Drive Planning records to database and further discuss with team (.3); emails and discuss with A. Pavon and L. Scruggs preserving Google Drive account, uploading all email accounts to document management platform, reducing costs of maintaining account, the deadline to make the next monthly payment, the outstanding balance due on the account, and related matters, and provide direction regarding same (.3); discuss with A. Pavon and C. Perez having Defendant's counsel perform privilege review of Defendant's email account so we can search account for non-privileged documents and related issues and provide input regarding communications with counsel regarding same (.2); emails with CNB regarding setting up online access to accounts (.1).

KDM 2.10 \$395.00 - \$829.50

09/09/2024

[Asset Disposition]: Emails with potential realtor for Georgia properties regarding his revised proposal and reduced commission rates and timing of selecting realtor and discuss with team (.2); emails with A. Pavon regarding same and confirming calls with two other potential realtors for Georgia properties and calls with potential realtors for Florida properties (.2); emails with other potential realtors for Georgia properties and confirming call to discuss proposals and discuss with A. Pavon (.2); meet with potential realtor for Florida properties and discuss with team (.4); Zoom meeting with another potential realtor for Florida properties regarding marketing strategy and commission rates for the listing of the properties and discuss with A. Pavon (.6); telephone call with potential realtor for Georgia properties regarding proposal for marketing and listing properties and discuss with A. Pavon (.4); emails with that realtor regarding same (.1).

09/09/2024 [Business Operation]: Emails with A. Pavon KDM 1.40 \$395.00 - \$553.00

	regarding ownership of property in which outdoor/gun store is being operated and related matters for purposes of letter to store demanding payment of rent and any agreements with Defendants or related entities, review latest revisions to letter, make further revisions, and coordinate finalizing and sending to store (.4); emails with A. Pavon and R. Landy regarding mortgage documents related to borrower who ceased making mortgage payments, review same, and strategize regarding making demand for payments (.3); review letter to borrower demanding mortgage payments to the Estate's designated account, review emails with borrower regarding same and account to which past due and future payments should be made, and emails with A. Pavon regarding same and related matters (.3); emails with borrower regarding insurance on the property and emails with team regarding same (.1); emails with C. Perez regarding invoice from contractor for certain work on multi-unit condo, review invoice, and initiate electronic payment of same (.2).					
09/09/2024	[Asset Analysis and Recovery]: Document review and search for information regarding potential assets and sources of recovery.	LS	4.70	\$275.00	25.0%	\$969.37
09/09/2024	[Asset Disposition]: Email exchange and telephone call with Realtor Martha Sells Cabins to discuss potential retention (.2); email exchange and telephone call with First Suburban Realty to discuss potential retention (.2); email exchanges with J. Hanson providing Florida property list and requesting call with Receiver (.2); email exchange and telephone call with Brit Patterson of Re/max to discuss potential retention (.3); telephone conference with M. Hernandez to discuss listing of Georgia properties (.3).	AP	1.20	\$250.00	-	\$300.00
09/09/2024	[Asset Analysis and Recovery]: Email exchange and telephone call with C. Rodriguez of CMR insurance requesting timeline on quotes for Florida Properties (.1); email exchange with K. Greene regarding insurance for Gulfport, Florida and payment for same (.1); telephone conference with Truist regarding timeline for wire support responsive to subpoena request (.1); email exchange with M. Koch	АР	2.60	\$250.00	-	\$650.00

	regarding 4-point inspection needed to ensure Florida properties (.1); review of scanned property files (.2); draft demand letter to K. Elkins regarding 123 Coles Crossing Road (.7); review and summarization of sale and mortgage documents for 123 Coles Crossing and email exchange with K. Murena regarding same (.4); analysis and search of Susan Clark's investment in St. Kitts and summary of same to C. Murena (.4); video conference with A. Laughlin, counsel for Chase, regarding subpoena requests (.2); email exchanges with K. Elkins providing demand (.2); email exchange with Coin Base requesting status of financial documents (.1).					
09/09/2024	[Business Operation]: Attend weekly zoom meeting with J. Burkhalter and staff to discuss Burkhalter Ranch, TBR Supply House, and Staurolite Barn (1.0); telephone call with T. Burkhalter regarding rent for TBR Outdoor and research into average rent per square foot in Blue Ridge, email exchange with K. Murena regarding same (.5); online chat with Google representative to determine Drive Planning workspace monthly payments and need to continue paying same and email exchange with K. Murena regarding same (.5); email exchange with J. Burkhalter requesting information on TBR Outdoor's financial institutions (.1); download statements for TBR Supply House and brief of same (.3); receipt and review of Staurolite Barn payroll (.1); email exchange with W. Mcnelley following up on mortgage payments (.1); receipt and review of invoices from Quality Worx and providing instruction to J. Burkhalter to negotiate same (.2).	AP	2.80	\$250.00	-	\$700.00
09/09/2024	[Case Administration]: Communication with DISCO regarding pricing for document database, with forensic accountant and company for planning of laptop pickup.	LS	0.20	\$275.00	25.0%	\$41.25
09/09/2024	[Asset Analysis and Recovery]: Email exchange with G. Hays providing financial statements and background on various accounts.	AP	0.10	\$250.00	-	\$25.00
09/10/2024	[Asset Analysis and Recovery]: Review and revise demand letter to TBR Outdoors and work on related strategy.	RML	0.20	\$395.00	-	\$79.00
09/10/2024	[Asset Analysis and Recovery]: Review and	RML	0.40	\$395.00	-	\$158.00

	analyze report on yacht from Captain Brooks and confer with Receiver regarding same (0.2); confer with Receiver regarding asset recovery strategy (0.2).					
09/10/2024	[Asset Analysis and Recovery]: Prepare final packages for Notice of Lis Pendens to be filed in Middle District of Florida and Southern District of Indiana.	jas	0.50	\$100.00	25.0%	\$37.50
09/10/2024	[Asset Analysis and Recovery]: Further emails with counsel regarding borrower's agreement to pay past due and make future mortgage payments and provide proof of insurance and coordinate following up on same and confirming receipt of past due payments (.2); work with A. Pavon and C. Perez on preparing and revising Notices of Lis Pendens for certain properties in which Estate has an interest, confirming addresses and legal descriptions, confirming filing and recording requirements in each jurisdiction, and coordinating having local counsel assist with certain Notices and related matters (1.2); discuss legal description of one property with C. Perez and review Warranty Deed for same, and emails with A. Pavon and potential realtor regarding legal descriptions and Warranty Deeds for various Georgia properties for purposes of Notices of Lis Pendens and review same (.2); review and make final revisions Notices, coordinate filing in various jurisdictions, and receive confirmation of same (.3); emails with A. Pavon and Georgia counsel regarding filing certain Notices in Misc. action pending in S.D. Ga. and confirming rules regarding disclosing addresses in filings (.1); emails with former counsel for Drive Planning in Tampa regarding his final invoice, payment of same, and remitting remaining funds in trust account to the Estate and provide wire instruction for fiduciary account for transfer of funds (.2); emails and discuss with A. Pavon issues with certain real properties in Georgia, confirming ownership and legal descriptions and whether they are referenced in Receivership Order and confirm Relief Defendants' position on Estate's interest and marketing properties for sale (.3); emails with R. Landy and yacht captain regarding weekly report of status and work done to maintain the yacht, review report, and discuss with team (.2); telephone call with R. Landy regarding	KDM	4.30	\$395.00		\$1,698.50

various asset recovery efforts, claims, and strategy, sale of real properties and selection of brokers for same, options for yacht brokers, communications with counsel for advisor who received real property from Drive Planning, and related matters (.4); review insurance policy renewal documents and emails with counsel regarding confirming properties covered, premium amounts, payment deadlines, and other matters (.3); emails with team regarding action filed against an advisor and investigation of same (.2); emails with counsel for investors regarding certain advisors' willingness to return commissions, strategy for seeking return of commissions and pursuing claims for same, and related matters, and discuss with C. Perez, A. Pavon, and R. Landy same, strategy for pursuing claims and preserving evidence, information regarding advisors, and related matters (.5); send email to K. Pearson regarding preparation of litigation hold letters to send to advisors and related matters and provide direction regarding same (.2).

09/10/2024

[Asset Disposition]: Emails with R. Landy regarding options for yacht brokers and related matters and discuss with team (.2); emails and discuss with A. Pavon calls with potential realtors for the Florida and Georgia properties to discuss the properties and their proposals and review proposals (.4); telephone call with one realtor regarding proposal for Georgia properties and discuss with team (.5); emails with potential realtor for Georgia properties regarding certain of the properties and property addresses and discuss with A. Pavon (.2); emails and telephone call with realtor confirming his selection as realtor for Georgia properties, discussing terms of listing agreement terms and reduced commission rates, strategy for marketing and preparing properties for sale, and arranging for meetings on the property for marketing purposes (.4); emails with A. Pavon regarding proposal for final Florida realtor being considered and review in advance of Zoom call with realtor (.3).

KDM

2.00 \$395.00

\$790.00

09/10/2024

[Case Administration]: Emails with CNB regarding transfer of funds to operating checking account for purposes of paying various expenses of the properties and businesses and provide account

KDM

2.10

\$395.00

\$829.50

information to A. Pavon for purposes of certain necessary payments, and emails with M. Dhanji regarding ordering checks for operating account (.2); emails with CNB regarding completing forms for online access and procedures for initiating outgoing transfers and work on completing forms (.3); emails with M. Dhanji regarding accounting issues including reimbursements from the Estate for operations and property expenses (.2); emails with M. Dhanji regarding wiring instructions for operating and reserve accounts at CNB, review same, and emails with team regarding procedures to follow for deposits and outgoing payments for expenses and operations (.2); review emails with investors and discuss with C. Perez same and other communications with investors and provide input regarding same (.3); discuss with C. Perez deadlines to file initial Status Report and Liquidation Plan and provide input regarding preparation of Liquidation Plan (.2); emails with A. Pavon regarding same and preparation of Status Report and provide input regarding same (.2); emails with Axos bank regarding setting up account for online access and training for accessing accounts through computer and phone, sending wires, and various security measures for account (.5).

09/10/2024

[Business Operation]: Review expense reimbursement request of handyman whose employment was terminated. confirm the materials were purchased and used for the properties and that back-up documentation was provided for each expense, discuss with C. Perez, and coordinate payment (.2); further emails with R. Landy regarding final version of letter to operator of outdoor/gun store on property owned by Relief Defendant demanding payment of rent or turnover of property, discuss with team, and coordinate sending letter with Receivership Order (.2); work on administrative matters and monitoring bank account activity related to operating the Florida properties, review recent automatic payments from operating account, and discuss with C. Perez (.2); emails with L. Scruggs regarding status of forensic imaging of Drive Planning Computers (.1); email from Disco providing amendment to contract, reducing certain billing rates, review amendment, and send email to K. Pearson regarding same and confirming

KDM 1.30 \$395.00 - \$513.50

	same with his contact at Disco (.2); email from J. Bowman forwarding information regarding various activity in operating account for the Florida properties, review same, and discuss with C. Perez for purposes of reconciliation of accounts (.2); email from counsel for J. Edwards regarding the last payroll payment, email from A. Pavon regarding same and related matters, discuss with R. Landy same and responding to counsel, and send email to A. Pavon regarding same (.2).					
09/10/2024	[Asset Analysis and Recovery]: Document review and search for records regarding assets and sources of recovery.	LS	6.30	\$275.00	25.0%	\$1,299.37
09/10/2024	[Asset Analysis and Recovery]: Strategize regarding litigation hold letters to brokers/advisors.	KP	0.20	\$375.00	-	\$75.00
09/10/2024	[Case Administration]: Respond to investor inquiries by email and telephone.	СРМ	2.10	\$375.00	-	\$787.50
09/10/2024	[Business Operation]: Telephone call and email exchange with L. Hood to discuss power and light bills for various properties (.2); email exchange with J. Burkhalter regarding property manager S. Mcgee and requesting information on same (.1); email exchange with K. Murena and R. Landy providing details on payroll period (.1).	АР	0.40	\$250.00	-	\$100.00
09/10/2024	[Business Operation]: Work on property management for Drive Gulport property and review revenue reports and Air BNB bookings and discuss with Homestay representative.	СРМ	1.60	\$375.00	-	\$600.00
09/10/2024	[Asset Analysis and Recovery]: Draft Notices of lis pendens for Indianapolis properties (.4); finalize Notices of lis pendens in Florida removing attorney of record information (.2); continued drafting and revisions to Notices of lis pendens for Georgia properties (.5); email exchange with Coinbase discussing missing support (.1); email exchange with H. Sewell providing direction on filing Notices of lis pendens (.1).	AP	1.30	\$250.00	-	\$325.00
09/10/2024	[Asset Disposition]: Email exchange with B. Patterson of Remax regarding potential selling of property (.1); video conference with C. Jaime of Global Luxury Realty regarding properties to list in Florida (.6); email exchange with K. Murena regarding	АР	2.40	\$250.00	-	\$600.00

	proportios to be sold (1); amail evaluance					
	properties to be sold (.1); email exchange with G. Mills requesting legal description of properties (.1); email exchange and telephone call with EV Mountains Realty Company to discuss listing of properties (.3); telephone call and email exchange with Laura Elleby with Compass and Brian White with Ansley Real Estate following investors recommendation on same (.6); receipt and review of proposal of Spitzer Rutland and video conference with same (.6).					
09/10/2024	[Case Administration]: Communication with DISCO (document management company) and forensic IT company.	LS	0.20	\$275.00	25.0%	\$41.25
09/11/2024	[Asset Analysis and Recovery]: Analyze recovery of assets from Mr. Linarducci and draft email to his counsel regarding same (0.2); review and analyze email from counsel for Julie Edwards, review and analyze relevant records, and draft response (0.2); review and analyze documents and information provided by Jason Schurr and DI Build regarding Indiana properties (0.2).	RML	0.60	\$395.00	-	\$237.00
09/11/2024	[Business Operation]: Email exchange with J. Burkhalter regarding Staurolite Barn Froman Event (.1); email exchange with J. Burkhalter regarding highland cattle sale (.1); email exchange with telephone call with T. Grant regarding outstanding bills for Tower Road properties (.2).	АР	0.40	\$250.00	-	\$100.00
09/11/2024	[Case Administration]: Telephone calls and emails with various investors regarding case status (3.4); and update case website based on requests from investors (1.0).	СРМ	4.40	\$375.00	-	\$1,650.00
09/11/2024	[Case Administration]: Discuss with TransPerfect, A. Pavon, and L. Scruggs issues related to size of hard drives being imaged, capturing and preserving email accounts, documents stored on DocuSign, ADP account, and other sources of records for purposes of searching same and uploading to document management platform, the various billing rates for same, and related matters and coordinate confirming procedures, timing, and costs (.5); emails from representatives of Disco and Lexbe regarding rates for uploading and maintaining records on document management platform, and prices for other services, emails and discuss with L.	KDM	1.80	\$395.00		\$711.00

Scruggs and K. Pearson proposals from two document management companies and related matters, and coordinate confirming certain rates based on size of database (.4); emails with City National Bank regarding administrator access to accounts, emails with M. Damian and M. Dhanji regarding same, review form to be signed, and telephone call with Bank regarding same and related matters (.3); review notice from IRS regarding deadline to file particular tax form, discuss with team, and emails with tax consultant and team regarding same (.2); emails with tax consultant regarding requirement to file Form 56 Notice of Fiduciary Relationship and provide direction to M. Dhanji regarding preparation of same (.1); receive confirmation of commencement of Misc. action in N.D. Cal. and emails with team regarding same (.1); emails with proposed counsel in NH to filing Notice of Receivership and Stay of Litigation in action brought against Drive Planning, review engagement letter, approve same, and emails with R. Landy regarding same and preparation of motion to employ counsel (.2).

[Business Operation]: Emails with R. Landy

09/11/2024

[Asset Analysis and Recovery]: Emails with team regarding filing of Notice of Lis Pendens in Misc. action pending in Indiana and timing of obtaining certified copy and recording same (.2); emails with R. Landy and counsel for advisor who received property from Drive Planning regarding turning over property to Estate and further discuss and related issues (.2); emails with R. Landy and A. Pavon regarding loan documents for property conveyed to advisor and further discuss with A. Pavon (.2); further emails with K. Pearson regarding litigation hold letter to be sent to advisors (.1); review Coinbase's Notice of Filing Certified Statement and discuss with team same (.2); review scope of production		and counsel for J. Edwards regarding the last payroll and further discuss with team (.2); emails with R. Landy and A. Pavon regarding cancelling lease of office space in Indiana and follow up on same and related issues (.2); emails with A. Pavon and contractor regarding maintenance of certain properties in Georgia and whether there are unpaid invoices (.1).					
	09/11/2024	team regarding filing of Notice of Lis Pendens in Misc. action pending in Indiana and timing of obtaining certified copy and recording same (.2); emails with R. Landy and counsel for advisor who received property from Drive Planning regarding turning over property to Estate and further discuss and related issues (.2); emails with R. Landy and A. Pavon regarding loan documents for property conveyed to advisor and further discuss with A. Pavon (.2); further emails with K. Pearson regarding litigation hold letter to be sent to advisors (.1); review Coinbase's Notice of Filing Certified Statement and discuss with	KDM	2.10	\$395.00	-	\$829.50

KDM

0.50

\$395.00

\$197.50

from Truist Bank, discuss with A. Pavon, and emails with forensic accountant regarding same and timing of production of wire transfer confirmations (.3); emails with contractor for two large properties in Indiana regarding status of work being done and to be done to properties, efforts to obtain permits, status of permit applications and applicable deadlines including deadline to commence work after permit is issued, outstanding invoices, and related matters, review various documents provided by contractor, emails with A. Pavon regarding same and locating realtor to provide input and assist with marketing properties, and provide direction regarding same (.6); emails with C. Perez regarding her communications with management company for the condo unit in Mexico regarding issues with power cutoff, hurricane shutters, and communications based on title ownership of the property, strategize regarding resolving issues, and send email to advisor's counsel following up on status of execution of the Assignment of entity that co-owns the condo unit (.3).

09/11/2	2024	[Asset Disposition]: Finish reviewing proposal from potential realtor for Florida properties and attend Zoom meeting with realtor to discuss proposal, the properties, marketing strategy, reduced commission rates, and other matters (.6); discuss with A. Pavon realtor and section of same for Florida properties and email and telephone call to realtor regarding same (.2); emails with realtor selected for Georgia properties regarding introducing him to J. Burkhalter for purposes of obtaining information regarding tours of the properties for purposes of preparing listings and formulating marketing strategy, discuss with A. Pavon, and review emails with realtor, A. Pavon, and J. Burkhalter regarding same (.2); telephone call and email to realtor selected for the Florida properties regarding selection, listing agreement, and next steps to market properties for sale (.1).	KDM	1.10	\$395.00		\$434.50
09/11/2	2024	[Case Administration]: Conference call with forensic IT company (.2); communication with Adriana Pavon and the forensic accountant regarding the imaging of the laptops (.3); and communication with document management companies regarding pricing (.4).	LS	0.90	\$275.00	25.0%	\$185.62

O9/11/2024 Case Administration]: Strategize regarding use of DISCO versus other eDiscovery platforms for case.							
real estate agent LH Group regarding proposal (1); mell exchange and telephone call with G. Mills regarding four of properties (.2); telephone call with J. Burkhalter regarding sale of TBR Supply House (1). 09/11/2024 [Asset Analysis and Recovery]: Email exchange and telephone call with J. Schnurr of DI Build regarding constructions in Indiana properties (.3); telephone call with J. Schnurr of DI Build regarding constructions in Indiana properties (.3); telephone call with forensic accountant regarding ADP reports and access (1); brief review of production from Truist and email exchange with forensic accountant providing same (.3). 09/11/2024 [Case Administration]: Review and analyze email and draft agreement from Prett Flaherty regarding retention for New Hampshire matter (0.2); call with Nathan Fennessy regarding same (0.1). 09/12/2024 [Asset Analysis and Recovery]: Review and analyze emails regarding securing Mexican condo and review and analyze from counsel for David Bradford regarding recovery of Mexican real estate (0.2); review and analyze email from K. Green regarding insurance payment due from Burkhalter, confer with Receiver, and draft email to A. Danzig regarding same (0.2). 09/12/2024 [Asset Analysis and Recovery]: Correspond regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St. Petersburg properties (3.2). 09/12/2024 [Business Operation]: Communications with J. Burkhalter regarding sole of cattle and approval of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with Receiver regarding sale of cattle and approval of s	09/11/2024	use of DISCO versus other eDiscovery	KP	0.30	\$375.00	-	\$112.50
exchange and telephone call with J. Schnurr of DI Build regarding constructions in Indiana properties (.3); telephone call with forensic accountant regarding ADP reports and access (.1); brief review of production from Truist and email exchange with forensic accountant providing same (.3). 09/11/2024 [Case Administration]: Review and analyze email and draft agreement from Preti Flaherly regarding retention for New Hampshire matter (0.2); call with Nathan Fennessy regarding same (0.1). 09/12/2024 [Asset Analysis and Recovery]: Review and analyze emails regarding securing Mexican condo and review and analyze from counsel for David Bradford regarding recovery of Mexican real estate (0.2); review and analyze email from K. Greene regarding insurance payment due from Burkhalter, confer with Receiver, and draft email to A. Danzig regarding same (0.2). 09/12/2024 [Asset Analysis and Recovery]: Correspond regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St. Petersburg properties (3.2). 09/12/2024 [Business Operation]: Communications with J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with ranch hand providing invoices for showing	09/11/2024	real estate agent LH Group regarding proposal (.1); email exchange and telephone call with G. Mills regarding tour of properties (.2); telephone call with J. Burkhalter regarding sale of TBR Supply	АР	0.40	\$250.00	-	\$100.00
email and draft agreement from Preti Flaherty regarding retention for New Hampshire matter (0.2); call with Nathan Fennessy regarding same (0.1). 09/12/2024 [Asset Analysis and Recovery]: Review and analyze emails regarding securing Mexican condo and review and analyze from counsel for David Bradford regarding recovery of Mexican real estate (0.2); review and analyze email from K. Greene regarding insurance payment due from Burkhalter, confer with Receiver, and draft email to A. Danzig regarding same (0.2). 09/12/2024 [Asset Analysis and Recovery]: Correspond regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St. Petersburg properties (3.2). 09/12/2024 [Business Operation]: Communications with J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with ranch hand providing invoices for showing	09/11/2024	exchange and telephone call with J. Schnurr of DI Build regarding constructions in Indiana properties (.3); telephone call with forensic accountant regarding ADP reports and access (.1); brief review of production from Truist and email exchange with forensic accountant providing same	АР	0.70	\$250.00	-	\$175.00
analyze emails regarding securing Mexican condo and review and analyze from counsel for David Bradford regarding recovery of Mexican real estate (0.2); review and analyze email from K. Greene regarding insurance payment due from Burkhalter, confer with Receiver, and draft email to A. Danzig regarding same (0.2). 09/12/2024 [Asset Analysis and Recovery]: Correspond regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St. Petersburg properties (3.2). 09/12/2024 [Business Operation]: Communications with J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with ranch hand providing invoices for showing	09/11/2024	email and draft agreement from Preti Flaherty regarding retention for New Hampshire matter (0.2); call with Nathan	RML	0.30	\$395.00	-	\$118.50
regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St. Petersburg properties (3.2). 109/12/2024 [Business Operation]: Communications with J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with ranch hand providing invoices for showing	09/12/2024	analyze emails regarding securing Mexican condo and review and analyze from counsel for David Bradford regarding recovery of Mexican real estate (0.2); review and analyze email from K. Greene regarding insurance payment due from Burkhalter, confer with Receiver, and draft	RML	0.40	\$395.00	-	\$158.00
J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with ranch hand providing invoices for showing	09/12/2024	regarding condo located in Cabo San Lucas and review ownership with receiver (.5); draft Quit claim deed for St. Petersburg condo owned by Bradford (1.0); work on property management issues and reconcile basis for outstanding checks on St.	CPM	4.70	\$375.00	-	\$1,762.50
	09/12/2024	J. Burkhalter regarding tour of properties, Chase account, and South State (.2); review of invoice from T. Grant and discussion with K. Murena regarding payment of same (.1); email exchange with Receiver regarding sale of cattle and approval of same (.1); email exchange with ranch hand providing invoices for showing	АР	1.30	\$250.00	-	\$325.00

of South State bank to discuss opening of account (.1); telephone call with ADP to update bank account (.5); email exchange with J. Clement regarding demand to pay rent for TBR Outdoor (.1); telephone call with T. Grant regarding payment instructions (.1). 09/12/2024 [Asset Analysis and Recovery]: Telephone jas 0.50 \$100.00 25.0% \$37.50 call with local counsel in SDNY to assist							
		account (.1); telephone call with ADP to update bank account (.5); email exchange with J. Clement regarding demand to pay rent for TBR Outdoor (.1); telephone call with T. Grant regarding payment					
with filing of miscellaneous action.	09/12/2024	call with local counsel in SDNY to assist	jas	0.50	\$100.00	25.0%	\$37.50
(Asset Analysis and Recovery): Emails with counsel for agent/advisor regarding urgent issues with Mexican condo, assignment documents to transfer his interest in condo to Estate, and proposed Deed to convey his interest in St. Petersburg condo to Estate, discuss with C. Perez and coordinate preparation of Quitclaim Deed, and request that agent/advisor immediately address emergency issues with management company for Mexican condo (5): email from counsel for agent/advisor confirming willingness to sign Assignment Agreement and related documents to transfer ownership interest in Mexican condo and discuss with team (2); review and revise Quit Claim Deed, send it to counsel for agent/advisor for execution, and email from counsel confirming agreement to sign (.2); multiple emails with insurance agent regarding deadline to pay premium for automobile insurance policy for vehicles owned by Burkhalter, enalis with R. Landy regarding same, and coordinate following up with Burkhalter's counsel on payment of premium (.3); emails with counsel for Burkhalter regarding same, conditions under which Estate can pay premium, confirmation of payment by Burkhalter, vehicles to be sold, and confirming procedures and timing of same, and discuss with team (.3); email from agent confirming burkhalter paid premium and confirm request for proposal for additional insurance for the barn in Georgia and emails with counsel regarding same (.2); emails with counsel for agent/advisors who received property from Drive Planning regarding proof of insurance, and discuss with team (.2); further emails with counsel for perpetition and other documents provided and emails with A. Pavor regarding same and efforts	09/12/2024	counsel for agent/advisor regarding urgent issues with Mexican condo, assignment documents to transfer his interest in condo to Estate, and proposed Deed to convey his interest in St. Petersburg condo to Estate, discuss with C. Perez and coordinate preparation of Quitclaim Deed, and request that agent/advisor immediately address emergency issues with management company for Mexican condo (.5); email from counsel for agent/advisor confirming willingness to sign Assignment Agreement and related documents to transfer ownership interest in Mexican condo and discuss with team (.2); review and revise Quit Claim Deed, send it to counsel for agent/advisor for execution, and email from counsel confirming agreement to sign (.2); multiple emails with insurance agent regarding deadline to pay premium for automobile insurance policy for vehicles owned by Burkhalter, emails with R. Landy regarding same, and coordinate following up with Burkhalter's counsel on payment of premium (.3); emails with counsel for Burkhalter regarding same, conditions under which Estate can pay premium, confirmation of payment by Burkhalter, vehicles to be sold, and confirming procedures and timing of same, and discuss with team (.3); email from agent confirming Burkhalter paid premium and confirm request for proposal for additional insurance for the barn in Georgia and emails with counsel regarding same (.2); emails with counsel for agent/advisors who received property from Drive Planning regarding proof of insurance and of mortgage payments, review proof of insurance, and discuss with team (.2); further emails with contractor for properties in Indiana regarding the permit application and other documents provided and emails	KDM	4.20	\$395.00		\$1,659.00

to locate realtor (.2); emails with insurance agent regarding quotes for general liability insurance on certain vacant lots, discuss with A. Pavon, and provide direction regarding confirming coverage and moving forward with policies (.2); review Cashier's Check from Chase Bank for the balance in account of Drive Planning, emails and discuss with M. Dhanji depositing same in fiduciary account for Estate, and emails with CNB regarding same and procedures for deposits (.2); emails with R. Landy regarding status of payment to yacht captain for monthly pay plus expenses, and emails and discuss with M. Dhanji same and procedures for future payments and accounting of same, and email to captain requesting W-9 (.2); emails with A. Pavon regarding proposal to maintain certain lots in Georgia, review proposal, and coordinate approving same and arranging for payment with M. Dhanji from fiduciary account (.2); emails and discuss with C. Perez payment of rent by tenants of condo unit on Ana Maria Island, the wire instructions for same, confirming title owner of property and notifying management office of same, discuss with A. Pavon and review documents regarding the property, and provide input to C. Perez regarding further discussions with management office (.3); emails with A. Pavon regarding her searches for mortgage documents for property purchased by Drive Planning and conveyed to agent/advisor and inquiring with counsel for agent/advisor and provide input to R. Landy regarding further communications with counsel regarding same and turnover of property and loan payments (.2); receive confirmation of filing of Notice of Lis Pendens in Misc. action in jurisdiction in which property in which Estate has an interest is located, discuss with J. Serna, and coordinate obtaining certified copy of same and having it sent to County recorder's office with cover letter, and approve checks for certified copy and recording (.2); emails with counsel for agent/advisor regarding the signed Assignment of Membership Interests in LLC that partially owns Mexican condo unit and related documents, review same and discuss with my counsel, and request scheduling of Special Meeting of Members to confirm assignment, consents of members, resolution of the LLC, and

	related documents (.3); emails with counsel for investors regarding status of agent/ advisor's transferring interests in properties to Estate, request for communications between Burkhalter and third party, issues based on privilege claims, third party's dealings with government, and former employee of Drive Planning and connection to third party and discuss with team (.3).					
09/12/2024	[Case Administration]: Further emails with R. Landy regarding engagement of New Hampshire counsel to file Notice of Receivership in action filed against Drive Planning and provide further input regarding preparation of Motion to employ such counsel (.1); receive confirmation of commencement of Misc. action in another jurisdiction and payment of filing fee and coordinate reimbursement of same to local counsel (.1).	KDM	0.20	\$395.00	-	\$79.00
09/12/2024	[Business Operation]: Multiple emails with A. Pavon, L. Scruggs, and counsel for J. Edwards regarding passwords needed to access laptop computers being imaged and discuss status of same with team (.2); review emails with principal of outdoor/gun store regarding the Receivership and the Receiver's demand for rent payments and documents regarding agreement for occupancy of property and further discuss with team (.2); emails and discuss with A. Pavon offer to purchase certain of the cattle, confirm purchase prices, expenses incurred for same, and market values, and provide direction regarding responding to offers (.3).	KDM	0.70	\$395.00	-	\$276.50
09/12/2024	[Asset Disposition]: Telephone calls with realtor for the Florida properties regarding the strategy for marketing properties for sale, arranging for inspections and analysis of properties, issues related to title ownership to certain properties, the property manager for certain properties, and connecting with administrator to obtain access and information for purposes of determining values and strategize regarding same (.5); email from Georgia realtor regarding his tour of the ranch, the barn, and the properties on and near the ranch, interactions with J. Burkhalter, ranch manager, and event manager, and strategy for preparing properties for marketing sale and discuss with team (.2); emails with J. Bowman regarding the selection of realtor	KDM	1.00	\$395.00	-	\$395.00

	and coordinating with realtor to grant him access to the properties (.1); emails with G. Hays and realtor regarding access to certain of the properties, preparing properties for marketing, insurance issues, and related matters, and further discuss with team (.2).					
09/12/2024	[Case Administration]: Communication with Kenneth Murena, Adriana Pavon, and Russell Landy regarding laptop imaging (.3); conference call with forensic company regarding pricing of imaging of google drives (.3).	LS	0.60	\$275.00	25.0%	\$123.75
09/12/2024	[Asset Analysis and Recovery]: Strategize regarding potential claims against financial institutions.	KP	0.50	\$375.00	-	\$187.50
09/12/2024	[Case Administration]: Work on Spanish language version of secure portal with Stretto.	СРМ	1.20	\$375.00	-	\$450.00
09/12/2024	[Asset Analysis and Recovery]: Receipt and review of multiple documents provided by DI Build regarding construction, permits, and outstanding invoices for work performed on 13562 116th Street, Fishers IN 46037 and 801 Atlanta Rd Roswell GA 30075 (.8); review of letter from NetJet and e-mail exchange with NetJet regarding same (.2); email exchange with K. Murena and R. Landy providing documents of Indiana property and brief search for same (.3); email exchange with J. Silber regarding filing of notice of lis pendens in New York (.1); email exchange with K. Elkins following up on mortgage payments and review of insurance proof provided by same (.1); email exchange with K. Greene regarding vacant lots and beneficial ownership of same (.1); continued search Google drive and e-mail of multiple employees to find background on Linarducci property (.3); email exchange with R. Landy regarding mortgage on Linarducci property (.1); email exchange with J. Silber providing notice of filing miscellaneous action (.3); email exchange with K. Greene providing responses to carrier's questions pertaining to vacant lots and requesting additional quotes (.2); email exchange and telephone call with K. Murena and C. Murena regarding ownership of Holmes Beach property (.3); email exchange with A. Brough of NetJet regarding termination of contract (.1); email	AP	3.00	\$250.00		\$750.00

	exchange with T. Dyer regarding frozen assets in account and telephone call (.1).					
09/12/2024	[Employment Application]: Draft motion to employ Preti Flaherty and proposed order regarding same.	AP	0.80	\$250.00	-	\$200.00
09/12/2024	[Asset Disposition]: Telephone call with four realtors to advise that Receiver has retained another company.	AP	0.50	\$250.00	-	\$125.00
09/12/2024	[Employment Application]: Work on retention of counsel in the New Hampshire case (0.1); review and revise motion to approve retention of Preti Flaherty and proposed order on same (0.3).	RML	0.40	\$395.00	-	\$158.00
09/12/2024	[Case Administration]: Email exchange with counsel for J. Edwards to obtain password for multiple computers (.1);	AP	0.10	\$250.00	-	\$25.00
09/12/2024	[Case Administration]: Telephone call with imaging company to determine status of same.	AP	0.20	\$250.00	-	\$50.00
09/13/2024	[Employment Application]: Work on motion to employ Preti Flaherty.	RML	0.10	\$395.00	-	\$39.50
09/13/2024	[Case Administration]: Prepare draft correspondence to investors regarding the return of checks sent to Drive Planning that were not deposited for attorney review	jas	0.30	\$100.00	25.0%	\$22.50
09/13/2024	[Case Administration]: Emails with financial advisor and forensic accountant regarding status of the receivership, efforts to comply with the Appointment Order, various work being done, and related matters and discuss with C. Perez (.4); emails with investors regarding the receivership, enforcement action, and the claims portal, and discuss with C. Perez her communications with investors regarding same and other matters (.4); telephone call with tax consultant regarding certain tax matters and filing requirements including Form 56 and work with M. Dhanji on preparing and filing with IRS Form 56 (.3); emails with financial advisor's office regarding status of removal and disposition of contents of storage space, terms of lease, and confirming move-out and termination in writing and provide direction to counsel regarding same (.2); provide further direction regarding returning uncashed checks to investors and other parties, review and revise letters, and	KDM	1.50	\$395.00		\$592.50

	coordinate finalizing and sending same (.2).					
09/13/2024	[Asset Analysis and Recovery]: Multiple emails with counsel for agent/advisor regarding the signed documents for Assignment of the LLC through which agent/advisor owned a 50% share in company that owns Mexican condo unit and scheduling the Special Meeting of the Members of the LLC to approve the assignment, company resolutions, and consents of Members (.3); discuss with R. Landy same and attendance at upcoming Special Meeting (.1); emails and telephone call with tax consultant regarding tax issues related to assignment of LLC that co-owns Mexican condo and Quitclaim Deed of condo in St. Petersburg, and discuss with C. Perez (.4); attend Special Meeting of Members, review the Assignment documents signed by the Members, discuss with my counsel, sign the documents as the Assignee Member, and send fully executed documents to counsel for former members (.6); emails with counsel for former members confirming consent to handwritten correction to date of Special Meeting in documents (.1); review and sign wire transfer authorization form for payment to yacht captain for August pay and expenses incurred, emails with M. Dhanji and City National Bank regarding same, telephone call with Bank to confirm wire, and receive confirmation wire was sent (.2); receive confirmation of deposit of check from Chase for balance in account of Drive Planning and discuss with M. Dhanji same and matters related to funds in two fiduciary accounts at City National Bank (.2); email from insurance agent providing proposal for additional insurance on the barn/event space and inquiring regarding insurance on two other properties, review proposal, and emails with A. Pavon regarding same and the timing of premium payments and terms of various insurance policies (.3).	KDM	2.20	\$395.00		\$869.00
09/13/2024	[Employment Application]: Emails with R. Landy and counsel for Burkhalter and counsel for Relief Defendants confirming no objections to proposed employment of NH counsel to defend Drive Planning and file Notice of Receivership and Stay of Litigation in action filed by investor.	KDM	0.10	\$395.00	-	\$39.50
09/13/2024	[Business Operation]: Emails with L.	KDM	0.40	\$395.00		\$158.00

	Scruggs regarding completion of imaging of most of the Drive Planning computers and the proposal from TransPerfectLegal regarding imaging of email accounts, and emails with team regarding same (.2); emails with L. Scruggs and counsel for J. Edwards regarding need for password for one computer to have it forensically imaged and provide direction to team regarding contacting former employee to obtain password (.2).					
09/13/2024	[Asset Disposition]: Emails with C. Perez and investor regarding proposed realtors for the Georgia properties (.1); email from Georgia realtor providing report regarding his meetings at the ranch, efforts to determine values and appropriate listing prices, recommendation regarding sale of cattle, and strategy for promoting the property including possible rodeo and discuss with C. Perez (.3); emails with J. Bowman, management company for one condo unit, and Florida realtor regarding accessing the unit, coordinating with renters, and monthly statements and invoices for maintenance fees and other costs, and further discuss with C. Perez (.2); emails with J. Bowman, Southern Homestay, and my Florida realtor regarding the status of rentals of the three Gulfport properties and arranging to inspect the properties as they become vacant for purposes of marketing and determining listing prices and provide input regarding same (.3); emails with Florida realtor regarding the zoning for the Gulfport properties and legal requirements regarding short term rentals and ceasing renting the properties for rent, and provide direction to J. Bowman and team regarding same and notifying Southern Homestay regarding ceasing renting properties, and coordinate confirming zoning and applicable rental laws (.3).	KDM	1.20	\$395.00	-	\$474.00
09/13/2024	[Case Administration]: Communication with forensic company and opposing counsel regarding completion of imaging of laptops.	LS	0.60	\$275.00	25.0%	\$123.75
09/13/2024	[Asset Analysis and Recovery]: Telephone call with Net Jets regarding interests in various air crafts and contracts on same (.6); email exchange with K. Greene regarding Tower Road insurance agency (.1); receipt and review of three insurance quotes and prepare summary spreadsheet	АР	1.20	\$250.00	-	\$300.00

	for K. Murena with recommendation on same (.5).					
09/13/2024	[Case Administration]: Revise Receivership website (.3); respond to investor inquiries regarding case status and upcoming secure upload of investor documents (1.6); meet with Stretto to finalize investor log for secure portal mass mailing (.4); meet with Stretto to finalize layout of secure portal (1.1).	СРМ	3.40	\$375.00	-	\$1,275.00
09/13/2024	[Business Operation]: Attention to operational and construction issues for various St. Petersburg rental properties and review and approve reimbursements for property needs.	СРМ	2.70	\$375.00	-	\$1,012.50
09/13/2024	[Business Operation]: Email exchange with M. Gregory providing approval for various bills related to cattle show.	AP	0.10	\$250.00	-	\$25.00
09/13/2024	[Asset Analysis and Recovery]: Review and analyze documents related to MAH LLC for purposes of Mexican Condo unit (0.1); confer with Receiver regarding same (0.1).	RML	0.20	\$395.00	-	\$79.00
09/14/2024	[Asset Disposition]: Telephone call with Georgia realtor regarding various issues related to the properties, preparing them for marketing, establishing values and listing prices, selling the cattle, and related matters and discuss with C. Perez.	KDM	0.40	\$395.00	-	\$158.00
09/15/2024	[Employment Application]: Revise Motion to employ New Hampshire counsel for purposes of action filed against Drive Planning in New Hampshire, emails with R. Landy regarding same, and send email to SEC counsel regarding need for counsel, forwarding draft Motion to employ, and requesting position on same (.4); revise Motion to employ Mexican counsel and proposed Order granting same, discus with C. Perez same and certain work to be done by Mexican counsel, and send to R. Landy to finalize and file (.4); email from counsel for SEC confirming no objection to proposed Motion to employ NH counsel, send email to R. Landy regarding same, and coordinate finalizing and filing Motion (.1).	KDM	0.90	\$395.00	-	\$355.50
09/15/2024	[Asset Disposition]: Email from counsel for Burkhalter regarding timing of sale of two vehicles and proposed procedure for same.	KDM	0.10	\$395.00	-	\$39.50

09/16/2024	[Asset Analysis and Recovery]: Telephone call and e-mail exchange with Heather of Z	AP	2.50	\$250.00	- \$625.00
	& Co Design regarding furniture and outstanding invoices of Drive Planning (.4); telephone call with G. Hill regarding insurance limits (.1); telephone call with K. Murena reviewing insurance proposals (.8); telephone call with K. Greene regarding cancelling of insurance that is no longer needed and new insurance proposals (.3); review of company records to obtain Brieasha Hobbs' contact (.1); email exchanges and telephone call with T. Dyer regarding new account (.1); receipt and review of mortgage payments from K. Elkins and forward of same to J. Burkhalter for confirmation that payments were received (.2); email exchange with K. Murena discussing Drive Planning's ownership of property (.1); review of business policy to determine ability to put claim against same or cancel for refund (.3); email exchange with K. Murphy				
09/16/2024	regarding yacht insurance (.1). [Case Administration]: Update Receivership website information (0.9); respond to investor inquiries by email and telephone and assist with data, upload inquiries and issues (5.8); and exchange emails and telephone calls with Stretto regarding same (1.1).	СРМ	7.80	\$375.00	- \$2,925.00
09/16/2024	[Business Operation]: Emails with A. Pavon and L. Scruggs regarding contacting former employee to obtain password to access computer and receive updates regarding same (.1); further emails with L. Scruggs regarding proposal for imaging entire Google email account and further discuss with A. Pavon same and maintaining account with Google and reducing monthly fees for same (.2); emails and discuss with A. Pavon need to have account at South State Bank unfrozen so funds can be used for operations and other necessary expenses of the Ranch, the Barn, and the Store, and prepare and send email to SEC counsel regarding same (.2); email from SEC confirming no objection to same and need to file Motion to lift the asset freeze as to that account, send email to A. Pavon regarding same and providing direction regarding preparation of motion, and revise draft letter to the bank regarding same (.3); receive update from A. Pavon regarding her attempt to confirm mortgage payment	KDM	1.40	\$395.00	- \$553.00

amount for the property on which TBR Supply is operating and provide input regarding further discussions with the mortgagee's counsel (.2); emails with A. Pavon and Georgia realtor regarding the upcoming cattle show and our participation at the show to sell cattle and further discuss with team (.2); email from A. Pavon providing analysis of business insurance policy for Drive Planning, type of coverages, whether it should be cancelled, possible partial refund of premium, and recommendation of insurance agent, strategize regarding same, and coordinate further analysis of policy (.2).

09/16/2024

[Asset Analysis and Recovery]: Multiple emails and discuss with A. Pavon various insurance policies, coverages, premiums, deadlines, and related issues, proposals from insurance agent to expand certain coverage and insure properties not currently insured, and related matters, review various insurance documents, and provide direction regarding confirming coverages, directing agent to bind policies, and other issues (1.3); email from counsel for agent/advisor providing fully executed Quit Claim Deed transferring all interests in property in St. Petersburg to the Estate, review same, emails with team regarding same and recording it in property records, discuss with C. Perez, A. Pavon, and J. Serna, receive confirmation of recording same in property records, and review recorded copy (.3); emails with SEC counsel regarding transfer of interests in condo units in St. Petersburg and Mexico to the Estate (.1); follow up on obtaining certified copy of Notice of Lis Pendens and having Clerk's Office send same to county property recording office in Indiana for purposes of preserving Estate's interest in real property in county and receive updates regarding same (.1); emails with A. Pavon regarding furniture purchased for two of the properties and costs to store, assemble and deliver same, review emails with A. Pavon and owners of furniture store and storage facility, and coordinate confirming costs and market rates for same (.2); discuss with A. Pavon status of insurance company's decision to renew policy for the yacht and review emails with A. Pavon and insurance agent regarding same (.1); emails with counsel for certain investors regarding facts supporting potential claims against a third

KDM 2.40 \$395.00 - \$948.00

	party, strategize regarding same, and confirm availability for call to further discuss (.3).					
9/16/2024	[Case Administration]: Emails with website manager and C. Perez regarding postings to the receivership website, review website, and provide input regarding further posts (.2); emails with C. Perez regarding the investor portal and communications with investors regarding same and their uploading information and documents (.2); emails with counsel for certain investors	KDM	1.10	\$395.00	-	\$434.50

regarding same and issues encountered with certain investors, discuss with C. Perez, and coordinate notifying Stretto (.2); email from investor providing information regarding his involvement and losses with Drive Planning and his communications with counsel for various investors regarding putative class action filed against agent/ advisor and related entities, status of receivership and enforcement action, and related matters, discuss with C. Perez information provided and responding to investor, and prepare and send email to investor (.3); discuss with C. Perez her communications with various investors and the status and issues with their uploading information and documents to the investor portal created by Stretto (.2).

KDM 1.40 \$395.00 - \$553.00

[Asset Analysis and Recovery]: Emails with Florida realtor regarding zoning laws to confirm ability to rent out tri-plex property, review information and documents provided, and coordinate having A. Pavon confirm same (.3); emails with Florida realtor, J. Bowman, rental property manager regarding accessing the tri-plex to assess condition and determine value for purposes of listing and marketing strategy and provide input regarding same (.2); discuss with C. Perez individual interested in certain of the properties in Georgia, coordinate providing him with contact information for the realtor, and prepare and send email to realtor regarding same (.2); emails with Georgia realtor and A. Pavon regarding various matters to address to prepare properties for marketing and showings and to determine appropriate listing prices and upcoming showing with prospective purchaser, and discuss with C. Perez (.2); emails with Florida realtor and Southern Homestay regarding the date the current tenants in the Tri-Plex will vacate

09/16/2024

	the properties for purposes of inspecting the properties, determining values, and marketing them for sale and discuss with C. Perez same and related matters (.2); email from Florida realtor providing report regarding his inspections of various properties and assistance needed to access other properties, provide information regarding those properties to assist with gaining access, and send emails to J. Bowman and counsel for Burkhalter to arrange for access to other properties (.3).					
09/16/2024	[Business Operation]: Telephone call with. J. Burkhalter, S. McGee, and S. Cook to discuss status of rentals, status of events, and other outstanding issues (1.0); email exchange with T. Hood of Tri-State Electric Membership Corporation to discuss outstanding bills for Georgia property (.1); telephone calls with J. Burkhalter reviewing rent payment locations (.3); email exchange with G. Mills regarding upcoming cattle show (.1); email exchange with W. Mcnelley and his attorney following up on mortgage payment schedule (.1).	АР	1.60	\$250.00	-	\$400.00
09/16/2024	[Business Operation]: Telephone call with K. Murena regarding unfreeze of assets held at South State Bank and strategy of same (.2); telephone call with J. Burkhalter regarding frozen funds (.1); email exchange with K. Murena regarding money market account at South State Bank and provide recommendation of unfreezing of same (.1); draft demand to South State Bank requesting unfreeze of funds (.5).	АР	0.90	\$250.00	-	\$225.00
09/16/2024	[Asset Disposition]: Email exchange with G. Mills regarding priority items for properties .	AP	0.10	\$250.00	-	\$25.00
09/17/2024	[Asset Analysis and Recovery]: Call from Marinemax regarding yacht payments and maintenance (0.2); review and analyze invoices and provide in put to Receiver on payment of same (0.1); analyze and work on removal of individual improperly residing at St. Petersburg house (0.1).	RML	0.40	\$395.00	-	\$158.00
09/17/2024	[Case Administration]: Finalize correspondence to investors with uncashed checks that were collected at Drive Planning offices and provide update to Receiver.	jas	0.60	\$100.00	25.0%	\$45.00
09/17/2024	[Asset Analysis and Recovery]: Telephone call and email exchange with note holder	AP	0.30	\$250.00	-	\$75.00

	W. Mcnelley regarding mortgage of TBR Supply Store.					
09/17/2024	[Asset Analysis and Recovery]: Review Travelers Business Insurance Policy (.3); and analyze potential coverage under the Employee Dishonesty provision for company executives (1.0).	MJK	1.30	\$225.00	25.0%	\$219.37
09/17/2024	[Case Administration]: Calls and emails with Stretto regarding investor issues with upload to investor portal (2.3); respond to investor inquiries regarding secure upload of investor documents (5.6).	СРМ	7.90	\$375.00	-	\$2,962.50
09/17/2024	[Case Administration]: Emails with Axos Bank regarding online access to fiduciary account and login to account online.	KDM	0.10	\$395.00	-	\$39.50
09/17/2024	[Asset Analysis and Recovery]: Emails with A. Pavon and insurance agent regarding whether the insurance company will renew the insurance policy on the yacht and further discuss with team same and obtaining quotes for alternative policies (.2); emails with counsel for investors regarding communications with individual with information regarding potential fraudulent transfers to two individuals, discuss with C. Perez, and emails with R. Landy and A. Pavon regarding same (.3); emails with R. Landy regarding invoices from MarineMax for electric and dock space for the yacht, review invoices, and coordinate payment of same (.2); emails with my counsel regarding analysis of the business policy to determine if the Estate has any claims against it and whether it is still necessary and provide direction regarding further analysis (.3); email from insurance agent forwarding email from insurance agent forwarding email from insurer regarding non-renewal of insurance on one property due to vacancy and emails with A. Pavon regarding same, deadline to obtain replacement insurance, and obtaining quotes for same (.2); email from insurance agent forwarding quotes for general liability policies covering several parcels of vacant land, review same, and emails with counsel regarding same (.3); email from insurance agent forwarding updated proposal for insurance for the barn with finance option, review proposal, and send email to counsel regarding same (.2); emails with A. Pavon and M. Koch regarding proposals for insurance on two Florida properties and status of arranging for inspection required	KDM	2.50	\$395.00		\$987.50

to obtain policies, and review proposals (.2); emails with A. Pavon regarding her investigation of the note and possible mortgage on the property on which TBR Supply House is located, calculation of monthly payments, investigation of value, and provision in note restricting early payments and provide direction regarding same (.2); telephone call with A. Pavon regarding preparation of Motion to unfreeze South State Bank account to use for operations of the Ranch, the Barn and TBR Supply House, email from A. Pavon providing draft Motion, email from R. Landy providing his revision to same, and begin reviewing and revising Motion (.4)

09/17/2024

[Asset Disposition]: Emails with J. Bowman regarding contact information for individual living in house in St. Petersburg for purposes of arranging for realtor to inspect the house and work on contacting individual (.2); discuss with A. Pavon and emails with A. Pavon and R. Landy regarding efforts to gain cooperation of resident of house and possible need to commence legal proceedings against her and provide input regarding same (.3); emails with counsel for Burkhalter regarding issues with contacting resident of house and possible assistance from Burkhalter and discuss with team same and related matters (.2); emails with agent/advisor who Quit Claim deeded condo unit in St. Petersburg to the Estate and his counsel regarding delivering keys and other materials to Florida realtor. discuss with team, and emails with realtor regarding same (.2); further strategize with C. Perez regarding working with Mexican counsel to preserve property in Mexico, communicate with property management company regarding same, locate realtor, and marketing property for sale (.2); multiple emails with Florida realtor regarding accessing certain of the properties and related issues and provide input regarding same (.2); emails with Southern Homestay regarding information regarding accessing the Tri-Plex in Gulfport and emails with realtor regarding same (.2); emails with A. Pavon and Georgia regarding accessing leased properties managed by third party, contact information for same, and status of obtaining leases, and related matters ,and review list of properties (.2); email from Georgia realtor forwarding draft Listing Agreement for one

KDM 1.90 \$395.00 - \$750.50

	of the properties and Sellers Disclosure					
	with explanation regarding, peruse same, and send email to A. Pavon and R. Landy regarding further review of both documents and scheduling call to discuss (.2).					
09/17/2024	[Employment Application]: Make final revisions to Motion to employ Mexican counsel for purposes of sale of condo unit, emails with R. Landy regarding same, and coordinate filing (.1); review Order granting Motion, discuss with C. Perez notifying Mexican counsel, sending retainer amount, and providing direction regarding taking control of condo unit and locating realtor to market it for sale, and emails with M. Dhanji regarding wiring retainer from fiduciary account (.4); follow up on status of finalizing and filing Motion to employ New Hampshire counsel for action against Drive Planning and receive confirmation of filing (.1).	KDM	0.60	\$395.00	-	\$237.00
09/17/2024	[Asset Disposition]: Telephone call and email exchange with G. Hills regarding properties.	AP	0.40	\$250.00	-	\$100.00
09/17/2024	[Business Operation]: Email exchange with J. Bowman regarding finances of Club 201 and request for additional reports (.1); telephone call and email exchange with S. McGhee requesting leases and access codes (.2).	АР	0.30	\$250.00	-	\$75.00
09/17/2024	[Employment Application]: Review and revise motion to employ Mexican counsel.	RML	0.10	\$395.00	-	\$39.50
09/17/2024	[Business Operation]: Review and revise motion to unfreeze certain bank account.	RML	0.10	\$395.00	-	\$39.50
09/17/2024	[Business Operation]: Draft motion to unfreeze funds held in SouthState Bank and proposed order on same.	AP	1.60	\$250.00	-	\$400.00
09/18/2024	[Asset Analysis and Recovery]: Prepare summary of insurance quotes for 5325 and 17670 condominiums for K. Murena and e-mail exchange regarding same (.1); email exchange with Heather of Z & Co Design requesting documents of furniture purchased by Drive Planning (.1); provide direction to M. Koch on moving forward with insurance and discussion with K. Murena regarding same (.1); draft complaint for unlawful for detainer against resident of Drive Planning house and research into with Florida Statute 82.04 and procedure in Pinellas county for same (2.1); email	АР	2.50	\$250.00	-	\$625.00

	exchange with TBR Outdoor Supply's owner to discuss demand for rent payment (.1).					
09/18/2024	[Case Administration]: Communication with forensic accountant re: production and upload documents into Dropbox (.2); and Document review/inventory (4.2); Call and Discussion with Kenneth Murena and Adriana Pavon regarding production (.2).	LS	4.60	\$275.00	25.0%	\$948.75
09/18/2024	[Asset Analysis and Recovery]: Search Julie Edwards's emails for copies of inspection reports for Drive Planning's properties in Saint Petersburg, FL (1.2); forward retrieved documents in correspondence to Chantelle Rodriguez at CMR Insurance Consultants (.2); phone calls with Chantelle Rodriguez discussing strategy to seek insurance and additional inspections for the properties (.7); phone call with A. Pavon discussing a grace period to repair the properties (.1).	MJK	2.20	\$225.00	25.0%	\$371.25
09/18/2024	[Case Administration]: Respond to various investor inquiries by emails and telephone calls (3.6); and address data upload issues with investors and Stretto (1.0).	CPM	4.60	\$375.00	-	\$1,725.00
09/18/2024	[Asset Disposition]: Attention to retention of Mexican counsel and emails regarding potential realtors, assignment of membership interest, deed and Mexican notary title documents.	СРМ	2.20	\$375.00	-	\$825.00
09/18/2024	[Asset Analysis and Recovery]: Further emails with insurance agent and my counsel regarding the proposed insurance policy for the barn/event space, emails with R. Landy and A. Pavon regarding paying full insurance premium for policy for the barn/event space, review and execute insurance documents, request payment instructions, discuss with A. Pavon, and coordinate sending documents to agent, binding policy, and paying premium (.4); emails and discuss with A. Pavon analysis of proposed policies for two Florida properties, review analysis, and coordinate approving and binding policies and requesting payment instructions (.3); discuss with A. Pavon and review and execute insurance documents for several parcels of vacant land in Georgia, send to agent and request confirmation of binding policy and payment instructions (.4); emails from insurance agent regarding timing of	KDM	2.90	\$395.00	-	\$1,145.50

binding foregoing policies and discuss with team (.1); emails with A. Pavon and representative of furniture and storage companies regarding outstanding balance for furniture and storage thereof for various properties in Georgia, review inventories of furniture, and discuss with team confirming same (.2); emails with Marine Max regarding payment of expenses for the yacht, review information provided, discuss with M. Dhanji, and provide direction regarding same (.2); review and sign checks for insurance premiums for certain properties and maintenance of the yacht and discuss with M. Dhanji for purposes of accounting (.2); emails with counsel regarding preparation of complaint for unlawful detainer against tenant of property who is failing to respond or cooperate with realtor or vacate the property, review draft complaint, and provide input regarding same (.2); emails with financial advisor regarding whether individual vacated property in Georgia and status of the property, and emails with A. Pavon regarding same (.2); emails with R. Landy and counsel for agent/advisor who resides in house purchased by Drive Planning regarding whether he will turn over house and pay all past due amounts and his request for loan documents, coordinate further searches through all Drive Planning records for loan documents, and emails with R. Landy regarding same and related matters (.3); emails with A. Pavon and tenant of land in Georgia regarding lease agreement and intention to sell property (.1); emails with A. Pavon and principal of outdoor store operating on property owned by Drive Planning following up on demand for payment of rent and provide input regarding further communications with principal and possible need to commence legal proceedings (.2) emails with J. Serna regarding status of receiving certified copy of Notice of Lis Pendens and sending to recorders office in county in which property is located (.1).

09/18/2024 [Asset Disposition]: Emails with Florida realtor and Southern Homestay regarding upcoming visit to the Tri-Plex and coordinate same with tenants and move-out schedule and discuss with team same and related issues (.2); discuss with C. Perez issues related to taking control of Mexican condo unit for purposes of accessing unit

KDM 0.80 \$395.00 - \$316.00

and marketing it for sale, documents evidencing ownership and obtaining same from counsel for agent/advisor or Burkhalters and whether further documentation is necessary to prove the Estate's ownership and control, coordinate having Mexican counsel investigate same, and send email to counsel for agent/advisor and counsel for Burkhalter requesting documentation for entity that owns condo unit (.4); emails with financial advisor regarding Georgia realtor's retrieval of keys and reviewing property records for purposes of inspecting properties and marketing them for sale and provide input regarding same (.2). 09/18/2024 [Business Operation]: Follow up on status **KDM** 1.00 \$395.00 \$395.00 of resolving password issue to image one laptop retrieved from Georgia office, receive update regarding same, and further discuss with team same and timing of delivery of images from TransPerfectLegal (.2); discuss with M. Dhanji various issues related to managing the Florida properties and accounting of funds in and out of accounts by J. Bowman and coordination of efforts related to same (.2); emails with A. Pavon regarding weekly report and financials for Club201 to monitor operations, review same, and emails with A. Pavon and J. Bowman regarding various payments made and need for additional information (.3); emails with financial advisor regarding completion of scanning of all records from Georgia office, invoice for same, and storing physical documents, review invoice, and coordinate payment of same (.1); discuss with A. Pavon offer to purchase various cattle, the market value of such cattle, and the proposed counteroffer to make, strategize regarding same, and approve proposed counteroffer (.2).

09/18/2024 [(

[Case Administration]: Discuss with L. Scruggs the status of compiling all records from various sources into one database and need to copy all documents onto external hard drive to provide to the CFTC and provide input regarding same (.3); email from L. Scruggs providing report regarding uploading to our system all documents from Georgia office to our system and status of downloading all records from Google email accounts, ADP account, and DocuSign account, and provide input regarding dealing with

KDM 0.90 \$395.00 - \$355.50

	representatives at those companies (.2); review and execute engagement letter agreement with Mexican counsel pursuant to order approving engagement of counsel, sign check for retainer, coordinate sending to Mexican counsel, and discuss with C. Perez and M. Dhanji (.2); review and execute Services Agreement with Stretto, pursuant to Order approving same, and send to Stretto, email from Stretto forwarding fully executed agreement, and review same (.2).					
09/18/2024	[Business Operation]: Conduct review of net sales, deductions and calculated net positive performance of Club 201 (.2); email exchange with J. Bowman requesting operational expenses (.1); communications with J. Burkhalter providing direction on outstanding invoice (.1); email exchange with Jason White regarding his rental of pasture behind Doc Road property (.1); email exchange with M. Gregory, range hand, to discuss outstanding items and request information on lease of pasture (.1); review of offers for cattle and e-mail exchanges with M. Gregory, range hand, regarding same (.2); email exchanges with M. Gregory regarding veterinary bill and providing instruction on same (.1).	АР	0.90	\$250.00	-	\$225.00
09/18/2024	[Asset Disposition]: Telephone call with G. Mills regarding real estate to be sold.	AP	0.10	\$250.00	-	\$25.00
09/18/2024	[Case Administration]: Email exchange with B. Hunt regarding laptop password.	AP	0.10	\$250.00	-	\$25.00
09/18/2024	[Business Operation]: Email exchange with counsels for parties to discuss Motion to Unfreeze.	AP	0.10	\$250.00	-	\$25.00
09/19/2024	[Business Operation]: Telephone call with J. Burkhalter discussing sale of cattle on the farm (.4); email exchanges with M. Gregory regarding sale of cattle and providing direction for same (.1); email exchange with J. White regarding lease of pasture and review of lease provided in same (.2); receipt and review of leases from Sadie McGhee and email exchange with Sadie McGhee regarding same (.2).	АР	0.90	\$250.00	-	\$225.00
09/19/2024	[Asset Analysis and Recovery]: Review and analyze documents related to Linarducci property (0.2); review and analyze documents from Tampa Bay Rays (0.2).	RML	0.40	\$395.00	-	\$158.00

09/19/2024	[Case Administration]: Document review and inventory (1.7); communicate with Kenneth Murena and Adriana Pavon regarding social media account (.2); and communication to attorney team on status of imaging of computers, documents and downloading emails (.2).	LS	2.10	\$275.00	25.0%	\$433.12
09/19/2024	[Asset Analysis and Recovery]: Conduct military search and prepare non-military affidavit, summons and civil cover sheet for unlawful detainer complaint for attorney review in preparation of filing against resident of Drive Planning house.	jas	1.10	\$100.00	25.0%	\$82.50
09/19/2024	[Case Administration]: Respond to numerous investor inquiries, and data upload issues by emails and telephone calls.	СРМ	3.60	\$375.00	-	\$1,350.00
09/19/2024	[Asset Analysis and Recovery]: Further emails with my counsel regarding searches for loan documents for property purchased by Drive Planning and occupied by agent/ advisor for purposes of discussions with his counsel regarding turnover of property, provide input regarding same, receive and review additional documents related to agent/advisor and property, and coordinate responding to agent/advisor's counsel regarding loan documents and reiterating demand for property or loan amount (.6); emails with counsel for investors regarding class action complaint filed against bank and review same and discuss with C. Perez in advance of call with counsel (1.1); call with counsel for investors regarding same and related matters and further strategize with team regarding same (.9); emails with counsel for other investors regarding his clients' claims, related issues, and scheduling call to discuss same, and discuss with my counsel (.2); emails with A. Pavon and NetJets regarding Drive Planning's ownership interest in multiple jets and lease agreement with NetJets and related matters, discuss with A. Pavon, and provide input regarding further discussions with NetJets (.4); emails with tenant in property owned by Drive Planning regarding coordinating with realtor to inspect and market property for sale and discuss with team (.2); emails with A. Pavon and forensic accountant regarding mortgage payments from individual residing in property for which Drive Planning holds note, review documents regarding same,	KDM	5.20	\$395.00		\$2,054.00

	and discuss with team (.3); telephone call with A. Pavon regarding various insurance policies and status of obtaining inspections on two properties necessary to obtain proposals and provide direction regarding same (.3); discuss with A. Pavon the status of payment of property taxes for all properties, the deadlines for same, and the various property tax related noticed retrieved from Drive Planning's offices, and provide direction regarding same (.3); emails with A. Pavon regarding properties in Georgia managed by third party, the leases for those properties, and related matters, review leases, and provide input regarding same (.2); emails with tenant of property in Georgia and A. Pavon regarding monthly lease payments and lease provision regarding first right of refusal for the sale of property, review lease, and strategize regarding same (.2); emails with A. Pavon regarding possible claim against insurance company based on information from investor, strategize regarding same, coordinate preparing Subpoena (.2); email from furniture company regarding paid and unpaid invoices for furniture ordered for various properties and review same (.1); email from storage company regarding unpaid invoices for storage of furniture and estimate for delivery and assembly of same to the properties, review same, and emails with team regarding same (.2).					
09/19/2024	[Case Administration]: Discuss with A. Pavon having email accounts of Burkhalter saved to document management platform so a privilege review can be performed by Burkhalter's counsel and emails with A. Pavon and L. Scruggs regarding same.	KDM	0.20	\$395.00	-	\$79.00
09/19/2024	[Asset Disposition]: Emails with A. Pavon and Georgia realtor regarding lease for one of the properties and interest of tenant in purchasing the property and contacting tenant to obtain purchase offer or discuss his right of refusal upon receiving other offers, and further discuss with team (.2); emails with C. Perez and management office for Mexican condo unit regarding requirements for accessing and taking full control of the unit, emails and discuss with C. Perez requesting assistance from agent/advisor who transferred his interest in unit to the Estate, and prepare and send email to agent/advisor's counsel regarding same (.2).	KDM	0.40	\$395.00	-	\$158.00

09/19/2024	[Business Operation]: Emails with counsel	KDM	1.30	\$395.00		\$513.50
	regarding status of efforts to obtain records and take control of social media accounts and provide input regarding same (.2); emails with counsel regarding obtaining complete copy of all emails and other records from Google account and all records stored in DocuSign account, provide further direction regarding same, and receive updates regarding same (.3); emails with L. Scruggs regarding inventory of documents scanned from Georgia office and review inventory (.2); email from L. Scruggs regarding TransPerfect's completion of imaging of the 7 laptop computers and the format of same to be provide to facilitate our searches and follow up on status of compiling all records and preparing them to produce to SEC (.2); email from A. Pavon forwarding communications with Tampa Bay Rays regarding agreement with Drive Planning and documents regarding same, review same, and provide direction regarding responding and demanding return of funds (.4).					
09/19/2024	[Asset Analysis and Recovery]: Receipt and review of documents from Tampa Bay Rays, including contract, communications, and invoices (.2); email exchange with K. Murena regarding strategy to recoup money from Tampa Bay Rays (.1); continued review of e-mails of G. Linarducci to obtain loan documents for purchase of property (.3); receipt and review of Net Jet leases, contracts, buy-out provision, and outstanding leases and prepare summary of same to Receiver (.5); email exchange with K. Murena providing summary of properties and lease agreements (.1); email exchange with G. Hayes providing information on 123 Cross property (.1); receipt and review of inventory list from Z & Co Design and e-mail exchange with realtor G. Mills regarding same (.2).	AP	1.50	\$250.00	-	\$375.00
09/19/2024	[Asset Disposition]: Email exchange with G. Mills providing lease for pasture and providing direction on right of first refusal.	AP	0.10	\$250.00	-	\$25.00
09/19/2024	[Asset Analysis and Recovery]: Document review and search for property related documents.	LS	3.30	\$275.00	25.0%	\$680.62
09/20/2024	[Asset Analysis and Recovery]: Draft email response to counsel for Linarducci	RML	0.30	\$395.00	-	\$118.50

regarding turnover of house (0.2); review and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1).					
[Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim.	MJK	1.00	\$225.00	25.0%	\$168.75
[Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Fulton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (.1); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (.1); review of Drive Planning emails to identify communications with M. Bruce and extraction of same for investor's attorney (.4); e-mail search into Meredith Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchange with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2).	AP	4.10	\$250.00	-	\$1,025.00
[Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York.	jas	0.50	\$100.00	25.0%	\$37.50
[Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review.	jas	3.90	\$100.00	25.0%	\$292.50
[Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0).	CPM	4.30	\$375.00	-	\$1,612.50
[Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue.	СРМ	1.30	\$375.00	-	\$487.50
[Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset recovery, including investigation of claims against third parties, agents/advisors, and other insiders, and records regarding same,	KDM	4.40	\$395.00	-	\$1,738.00
	and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1). [Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim. [Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Fulton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (.1); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (.1); review of Drive Planning emails to identify communications with M. Bruce and extraction of same for investor's attorney (.4); e-mail search into Meredith Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchange with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2). [Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York. [Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review. [Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0). [Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue. [Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset recovery, including investigation of claims against third parties, agents/advisors, and	and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1). [Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim. [Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Fulton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (11); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (.1); review of Drive Planning emails to identify communications with M. Bruce and extraction of same for investor's attorney (.4); e-mail search into Meredith Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchange with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2). [Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York. [Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review. [Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0). [Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue. [Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset recovery, including investigation of claims against third parties, agents/advisors, and	and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1). [Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim. [Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Fulton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (1); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (.1); review of Drive Planning emails to identify communications with M. Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchange with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2). [Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York. [Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review. [Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0). [Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue. [Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset recovery, including investigation of claims against third parties, agents/advisors, and	and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1). [Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim. [Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Fulton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (1); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (1); review of Drive Planning emails to identify communications with M. Bruce and extraction of same for investor's attorney (.4); e-mail search into Meredith Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchange with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2). [Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York. [Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review. [Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0). [Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue. [Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset remination and payroll issue.	and analyze email and document provided by A. Danzig regarding 712 43rd Ave. property (0.1). [Asset Analysis and Recovery]: Legal research on Traveler's business insurance policy language for purposes of filing claim. [Asset Analysis and Recovery]: Receipt, review, and public records search into tax bills in Pinellas, Fannin, Manatee, Bay, and Futton County for all Drive Planning Proprties (2.2); email exchange with tax appraiser office of Fannin County to discuss Drive Planning properties (1); email exchange with M. Hayes following up on phone call to discuss promissory note (.1); brief review of docu-sign to provide instruction to K. Murena regarding same (.1); email exchange with S. Askue regarding ADP reports (.1); review of Drive Planning emails to identify communications with M. Bruce and extraction of Same for investor's attorney (.4); e-mail search into Meredith Bruce and extraction of 200 plus e-mails to Receiver (.8); public records search into Go Drive Planning, LLC and e-mail exchanges with K. Murena regarding same (.1); email exchanges with local counsel regarding miscellaneous action and commencement of same (.2). [Asset Analysis and Recovery]: Prepare civil cover sheet for miscellaneous action in Southern District of New York. [Business Operation]: Gather all signed agreements from DocuSign account related to Mary Cagle for attorney review. [Case Administration]: Respond to investor, inquiries, and data upload issues by emails and telephone calls and exchange emails (3.3); and calls with Stretto regarding same (1.0). [Business Operation]: Respond to emails regarding property management issues and lease termination and payroll issue. [Asset Analysis and Recovery]: Prepare for and attend call with counsel for investors regarding various matters related to asset recovery, including investigation of claims against third parties, agents/advisors, and

and strategize with C. Perez regarding same (1.4); discuss with A. Pavon various matters to investigate related to securing and recovering assets and provide direction regarding same (.3); multiple emails with A. Pavon and M. Dhanji regarding payment of property taxes for various properties in Florida and Georgia and registering for online access to accounts with tax collectors for various counties, emails with tax collector regarding same, review tax bills, confirm deadlines to pay taxes, and coordinate payment of same prior to deadlines (.5); emails with A. Pavon and tax collectors in Georgia requesting status of tax payments for various properties and review list of properties in that County (.1); emails with R. Landy and counsel for agent/ advisor regarding the loan documents for Drive Planning's loan to agent/advisor and our demand for turnover of the house or payment of full loan amount and further strategize with my counsel (.2); emails with A. Pavon and another agent/advisor who received loan regarding the status of his making past due and current monthly loan payments and related matters and further discuss with team (.2); follow up on status of recording of various Notices of Lis Pendens on properties in which Estate has interest and having other Notices filed in Misc. actions and obtaining certified copies of same, receive updates regarding same, discus with A. Pavon and J. Serna, and emails with local counsel in Georgia regarding same, requirements for filings and recordings, and related matters up having certain Notices filed in Misc. action in Georgia (.3); emails with agent/advisor who transferred his interest in Mexican condo unit and the management office of condo building regarding granting full access and control of unit to me and my Mexican counsel and realtor, further discuss with C. Perez, and send email to agent/advisor requesting all unpaid invoices (.3); discuss with C. Perez and emails with my Mexican counsel and counsel for agent/ advisor regarding formation documents needed for foreign LLC that owns condo unit and related documents and information needed to sell unit and strategize regarding same (.3); emails with A. Pavon regarding investigating insurance company involved with investors and Drive Planning and sending Subpoena to same and provide

\$395.00

direction regarding same (.2); emails with my counsel regarding Burkhalter's assets, confirming their location, and confirming imaging and preservation of all digital devices and service providers and provide direction regarding sending email to Burkhalter's counsel regarding same (.2); email from M. Koch regarding analysis of business policy and potential claim for employee dishonesty and provide direction regarding preparation of claim (.2); emails with A. Pavon regarding her investigation of entity affiliated with Drive Planning and its President and former employee of Drive Planning, investigation of an agent/advisor, and further investigation to be done, and provide direction regarding preparation of letters to those individuals and other agents/advisors (.2). 09/20/2024 [Asset Disposition]: Emails with J. Bowman, **KDM** 1.00 \$395.00 Florida realtor, and Southern Homestay regarding completion of visit to the Tri-Plex in Gulfport to inspect and photograph property for purposes of determining appropriate listing price and marketing it for sale and discuss with team same and related matters (.2); emails with realtor of potential purchaser of certain Georgia properties and emails with my Georgia

realtor regarding same (.2); emails with management office and Mexican condo granting of access to unit and arranging for meeting and discuss with C. Perez (.1); emails with counsel for Burkhalter regarding accessing house in St. Petersburg and communications with current resident, agreement to purchase with that resident, potential purchaser of apartment complex, and sale of Aston Martin, review contract to purchase, and discuss with team (.3); emails with A. Pavon regarding sale of Aston Martin and pickup truck in St. Petersburg, provide direction regarding same, and provide documents regarding same (.2).

KDM 0.50 \$395.00 - \$197.50

[Case Administration]: Follow up on status of uploading email accounts to document management platform for purposes of reviewing same and investigating assets, having Burkhalter's counsel perform privilege review of same, and providing information to counsel for investors, and further discuss with A. Pavon (.2); emails with team regarding proposal from Lexbe representative for document management

09/20/2024

platform, hosting fees, and hourly rate for assistance with uploads and technical support, review proposal, negotiate reduced fees and hourly rate with representative and coordinate commencing copying and uploading email accounts, and further discuss with A. Pavon same, login credentials for Google account, and related matters (3.). 09/20/2024 [Business Operation]: Emails and discuss with C. Perez and A. Pavon running payroll for J. Bowman and reserve confirmation of same (2); emails and telephone call with A. Pavon regarding status of downloading all documents from Drive Planning's DocuSign account and receive update regarding same and related matters for purposes of compiling and organizing all reacrods (2); emails and discuss with A. Pavon taking control of Drive Planning's LinkedIn account, taking down LinkedIn page, saving all pages, and sending demand to produce all records and data for account (2); emails and discuss with A. Pavon Teve Planning's Zoom account, taking control of same and sending demand to turn over account and preserve and produce all records and recording, and need to access account, and coordinate requesting authority for same from counsel for Burkhatter's email account to access account, and coordinate requesting authority for same from counsel for Burkhatter's email account to access account, and coordinate requesting authority for same from counsel for Burkhatter's email accounts and arranging for privilege review of his email accounts and uploading same to Lexbe document management platform, and further discuss with A. Pavon (.1); email from L. Scruggs regarding upload of records to platform (.3); telephone calls and discussion with L. Scruggs regarding upload of records to platform (.3); telephone calls and email exchanges with O. De La Torre to provide direction on imaging Google Drive (.5); email exchange with Local counsel regarding miscellaneous action (.1); telephone calls with K. Murena regarding opening up miscellaneous action (.1); telephone calls with K. Murena regarding							
with C. Perez and Á. Pavon running payroll for J. Bowman and receive confirmation of same (.2); emails and telephone call with A. Pavon regarding status of downloading all documents from Drive Planning's DocuSign account and receive update regarding same and related matters for purposes of compiling and organizing all records (.2); emails and discuss with A. Pavon taking control of Drive Planning's LinkedIn account, taking down LinkedIn page, saving all pages, and sending demand to produce all records and data for account (.2); emails and discuss with A. Pavon Drive Planning's Zoom account, taking control of Same and sending demand to turn over account and preserve and produce all records and recording, and need to access Burkhalter's email account to access account, and coordinate requesting authority for same from counsel for Burkhalter (.2); emails from A. Pavon to counsel for Burkhalter (.2); email from A. Pavon to counsel for Burkhalter (.2); email from A. Pavon to counsel for Burkhalter (.2); email from A. Pavon to counsel for Burkhalter (.2); email from A. Pavon to counsel for Burkhalter (.3); email accounts and arranging for privilege review of his email accounts and further discuss with A. Pavon (.1); email from L. Scruggs regarding the status of compiling and organizing all sources of records, saving same to external hard drive to send to SEC counsel, and uploading same to Lexbe document management platform, and further discuss with team (.2). 09/20/20/2024 [Case Administration]: In-person meetings and discussion with L. Scruggs regarding upload of records to platform (.3); telephone calls and email exchanges with O. De La Torre to provide direction on imaging Google Drive (.5); email exchange with local counsel regarding miscellaneous action (.1); telephone call with K. Murena regarding opening up miscellaneous action (.1); telephone call with K. Murena regarding opening up miscellaneous action (.1).		assistance with uploads and technical support, review proposal, negotiate reduced fees and hourly rate with representative and coordinate commencing copying and uploading email accounts, and further discuss with A. Pavon same, login credentials for Google account, and related					
and discussion with L. Scruggs regarding upload of records to platform (.3); telephone calls and email exchanges with O. De La Torre to provide direction on imaging Google Drive (.5); email exchange with local counsel regarding miscellaneous action (.1); telephone call with K. Murena regarding opening up miscellaneous action (.1). 09/20/2024 [Business Operation]: Run pay-roll for Drive AP 0.20 \$250.00 - \$50.00	09/20/2024	with C. Perez and A. Pavon running payroll for J. Bowman and receive confirmation of same (.2); emails and telephone call with A. Pavon regarding status of downloading all documents from Drive Planning's DocuSign account and receive update regarding same and related matters for purposes of compiling and organizing all records (.2); emails and discuss with A. Pavon taking control of Drive Planning's LinkedIn account, taking down LinkedIn page, saving all pages, and sending demand to produce all records and data for account (.2); emails and discuss with A. Pavon Drive Planning's Zoom account, taking control of same and sending demand to turn over account and preserve and produce all records and recording, and need to access Burkhalter's email account to access account, and coordinate requesting authority for same from counsel for Burkhalter (.2); email from A. Pavon to counsel for Burkhalter (.2); email accounts and arranging for privilege review of his email accounts and further discuss with A. Pavon (.1); email from L. Scruggs regarding the status of compiling and organizing all sources of records, saving same to external hard drive to send to SEC counsel, and uploading same to Lexbe document management platform, and further discuss	KDM	1.10	\$395.00	-	\$434.50
	09/20/2024	and discussion with L. Scruggs regarding upload of records to platform (.3); telephone calls and email exchanges with O. De La Torre to provide direction on imaging Google Drive (.5); email exchange with local counsel regarding miscellaneous action (.1); telephone call with K. Murena regarding opening up miscellaneous action	АР	1.00	\$250.00	-	\$250.00
	09/20/2024		AP	0.20	\$250.00	-	\$50.00

09/20/2024	[Asset Disposition]: Calls and emails with Mexican counsel and Solaz property manager regarding transfer of ownership and access to property.	СРМ	1.20	\$375.00	-	\$450.00
09/22/2024	[Asset Analysis and Recovery]: Review and analyze analysis of recovered documents (0.1); email exchange with A. Pavon regarding several asset recovery strategy matters (0.1).	RML	0.20	\$395.00	-	\$79.00
09/22/2024	[Business Operation]: Finish reviewing and revising Motion to unfreeze funds needed to maintain and preserve business and properties in Georgia and emails with my counsel regarding same (.6); send draft Motion to SEC counsel to confirm their position on same and send further email to A. Pavon regarding same (.1).	KDM	0.70	\$395.00	-	\$276.50
09/23/2024	[Case Administration]: Discuss various investor issues with Receiver (.8); and with Stretto (.7).	СРМ	1.50	\$375.00	-	\$562.50
09/23/2024	[Case Administration]: Respond to investor inquiries regarding case status and data upload by emails and telephone calls.	СРМ	6.30	\$375.00	-	\$2,362.50
09/23/2024	[Asset Analysis and Recovery]: Telephone calls and email exchange with G. Hays providing terms for promissory note and discussing correct interest rate (.5); email exchange with K. Pearson providing broker information for hold letters (.1); email exchange with M. Haye following up on Receiver's demands (.1); telephone call with insurance broker providing updates on Live More Yacht and requesting new quotes (.2); telephone call with Captain Brooks to discuss hurricane plan ahead of potential hurricane and e-mail exchange with K. Murena and R. Landy regarding same (.2); email exchange with counsel for Net Jet requesting proposal of purchase of interest (.1); receipt and review of insurance binders from K. Greene and email exchange with K. Murena regarding same (.1); receipt and review of multiple invoices from Z & Co. and e-mail exchange with Receiver regarding same (.2); review of promissory note for M. Hayes ahead of conference call with same (.4).	АР	1.90	\$250.00	-	\$475.00
09/23/2024	[Asset Analysis and Recovery]: Review and analyze emails from Capt. Brooks and MarineMax regarding yacht storm preparation and sale and draft responses	RML	0.60	\$395.00	-	\$237.00

	(0.4); work on strategy related to loan related to TBR Supply property (0.2).					
09/23/2024	[Asset Analysis and Recovery]: Analyze facts and policy language for purposes of filing claim against business insurance policy.	MJK	1.00	\$225.00	25.0%	\$168.75
09/23/2024	[Asset Analysis and Recovery]: Identify proper claims filing process and language requirements for potential dishonesty claim against business insurance policy.	MJK	0.80	\$225.00	25.0%	\$135.00
09/23/2024	[Business Operation]: Continue to gather signed agreements from DocuSign account related to Mary Cagle for attorney review.	jas	3.50	\$100.00	25.0%	\$262.50
09/23/2024	[Case Administration]: Prepare outline and begin drafting initial Status Report to include background of case, receivership order, and introduction; revise asset list for incorporation of same within initial Status Report.	АР	2.20	\$250.00	-	\$550.00
09/23/2024	[Asset Analysis and Recovery]: Email from insurance agent providing invoices and binders for three insurance policies, review same, discuss with A. Pavon paying one invoice from Estate and having J. Burkhalter pay other invoices from account to be unfrozen, and send email to M. Dhanji regarding same (.3); emails and discuss with A. Pavon status of confirming status of payment of taxes for various real properties and investigating tax lien issues, and emails with V. Lamonica regarding same (.2); emails and discuss with A. Pavon agreement with lender to monthly mortgage payment amount, forensic accountant's confirmation of same, determining whether there is equity in the property, and having lender waive Note provision regarding timing of sale and early payment penalty, and provide direction regarding further discussions with lender (.3); emails with A. Pavon regarding confirming the entities that purchased the furniture and owned the property in which furniture will be delivered and assembled, review invoices and property list, and provide direction regarding payment of invoices from appropriate accounts (.2); emails with my Georgia counsel regarding proper forum in which to file Notices of Lis Pendens for certain properties and issues with redacting address in N.D. Ga., further emails with team regarding same, and provide direction	KDM	2.30	\$395.00		\$908.50

regarding same (.2); emails with borrower and A. Pavon regarding scheduling call to discuss monthly loan payments and related matters, emails with A. Pavon and R. Landy regarding same, and prepare for call (.2); emails with condo association for building in which Defendant's unit is located regarding payment of association dues, discuss with team, and send email to Defendant's counsel regarding same, the date the Defendant will vacate the unit, and coordinating with realtor (.2); emails from R. Landy and A. Pavon regarding report from yacht captain regarding upcoming storm, status of securing yacht, and recommendation regarding same and possible need to move yacht, and discuss with A. Pavon (.2); emails with A. Pavon and V. Lamonica regarding investigation of zoning for Tri-Plex to confirm if property can have short term rentals and provide input regarding same (.2); emails with A. Pavon and C. Perez regarding the management contract with Southern Homestay for the triplex in Gulfport (.1); emails with A. Pavon and K. Pearson regarding the litigation hold letters to be send to all agents/advisors, the list of agents/advisors and commissions they received, and related issues, and provide input regarding same (.2).

09/23/2024	[Business Operation]: Emails with R. Landy regarding request for payment of outstanding invoice by former accounting firm for Drive Planning LLC, review emails, invoice, and related document from accountant, and provide direction to R. Landy regarding further communications with accountant.	KDM	0.20	\$395.00	- \$79.00
09/23/2024	[Asset Disposition]: Prepare for call with Mexican attorney for purposes of taking control of condo unit in Mexico, addressing corporate issues of Mexican entity that owns unit, marketing unit for sale through local realtor, and effecting transfer of title and recovery of sale proceeds, and discuss related issues with C. Perez (.3); attend call with Mexican counsel regarding the foregoing, status of obtaining corporate records and Mexican accountant for entity that owns unit, strategy for addressing various corporate issues, and related matters and further discuss with C. Perez (.4); follow up on obtaining corporate records and Mexican accountant from counsel for agent/advisor who transferred	KDM	1.70	\$395.00	- \$671.50

	his interest to Estate and prepare and send email to Defendant's counsel regarding same (.1); email from counsel for agent/ advisor forwarding corporate records, review same and discuss with C. Perez, and send to Mexican counsel for review (.3); email from my Mexican counsel regarding the documents provided by agent/advisor's counsel and requesting contact information for accountant in Mexico (.1); multiple emails with A. Pavon and Georgia realtor regarding the furnishings in one of the properties, J. Burkhalter's proposal to sell certain items, and related issues, review reports from A. Pavon regarding her investigation of same, and provide input regarding same (.2); email from J. Burkhalter forwarding offer to purchase certain furnishings, review same, and emails with A. Pavon and Georgia realtor regarding rejecting offer and keeping all furnishings in the house (.1); emails with A. Pavon and R. Landy regarding issue involving home theater system at house, input from Georgia realtor and recommendation regarding resolution of issue, strategize regarding same, and approve recommendation (.2).					
09/23/2024	[Asset Analysis and Recovery]: Email exchange with W. McNelley regarding promissory note and interest rate (.1); telephone call with G. Hays and M. Mcnelley regarding promissory note and plans to sell property (.2).	АР	0.30	\$250.00	-	\$75.00
09/23/2024	[Asset Disposition]: Email exchange with G. Mills regarding J. Burkhalter furniture (.1); telephone call with J. Burkhalter regarding furniture on property and sale of same (.2); email exchange with G. Mills discussing recommendation for sale of property and updates on same (.1); telephone call with G. Hills providing multiple updates to real estate listings (.5).	AP	0.90	\$250.00	-	\$225.00
09/23/2024	[Case Administration]: Email exchange with O. De La Torre providing access for Google Drive.	AP	0.10	\$250.00	-	\$25.00
09/23/2024	[Business Operation]: Finalize motion to unfreeze account and proposed order on same (.2); email exchange with South State Bank to provide unfreeze order and provide direction on new bank account (.1).	АР	0.30	\$250.00	-	\$75.00
09/23/2024	[Case Administration]: Review and analyze	RML	0.10	\$395.00	-	\$39.50

	email from former Drive Planning accountant Marshall Glade and confer with Receiver regarding same.					
09/23/2024	[Business Operation]: Emails with SEC counsel confirming no objection to Motion to lift asset freeze to utilize funds to maintain and preserve businesses and property in which Estate has interest, emails with team regarding finalizing the Motion, review and revise proposed Order, emails with my counsel regarding same, and coordinate filing (.3); review Order granting Motion to unfreeze account, discuss with A. Pavon, coordinate sending to SouthState Bank, and receive updates regarding timing of unfreezing of account (.2);	KDM	0.50	\$395.00	-	\$197.50
09/23/2024	[Business Operation]: Weekly telephone call with J. Burkhalter and staff regarding the store, the ranch, and the event space.	AP	1.00	\$250.00	-	\$250.00
09/24/2024	[Asset Analysis and Recovery]: Telephone call and email exchange with G. Mills regarding 801 Atlanta Rd Roswell and mortgage on TBR Supply property (.3); email exchange with T. Dyer of South State Bank to follow-up on unfreezing of assets and opening up of new account (.1); email exchange with J. Clement requesting attorneys' information (.1); email exchange with G. Hayes regarding DI Build (.1); email exchange with J. Burkhalter providing instruction on home theater system lien (.1).	АР	0.70	\$250.00	-	\$175.00
09/24/2024	[Asset Analysis and Recovery]: Email exchange with MarineMax and confer with Receiver regarding hurricane preparations for yacht.	RML	0.20	\$395.00	-	\$79.00
09/24/2024	[Asset Analysis and Recovery]: Review and analyze email from investor and draft response.	RML	0.10	\$395.00	-	\$39.50
09/24/2024	[Asset Analysis and Recovery]: Review correspondence from Chantelle Rodriguez discussing insurability of St. Petersburg properties (.2); draft and send correspondence to A. Pavon to discuss strategy (.1).	МЈК	0.30	\$225.00	25.0%	\$50.62
09/24/2024	[Business Operation]: Continue to gather signed agreements from docusign account related to Mary Cagle for attorney review.	jas	2.90	\$100.00	25.0%	\$217.50

09/24/2024	[Case Administration]: Document review and organization of records of estate (4.5); communication with forensic company (.2).	LS	4.70	\$275.00	25.0%	\$969.37
09/24/2024	[Asset Disposition]: Telephone conference with realtors in Mexico and exchange emails and documents with same and with Mexican counsel and with property manager for condominium unit in Mexico.	СРМ	2.70	\$375.00	-	\$1,012.50
09/24/2024	[Case Administration]: Respond to investor inquiries by telephone and email.	СРМ	1.90	\$375.00	-	\$712.50
09/24/2024	[Asset Analysis and Recovery]: Further emails with condo association management regarding the payment of future association dues for Defendant's condo unit, emails with J. Serna and M. Dhanji regarding same, and coordinate monthly payments (.2); multiple emails and telephone calls with R. Landy and Marine Max regarding moving the yacht to dry dock storage to protect it from the approaching tropical storm/hurricane, review agreement and invoice for storage, and pay fee to move the yacht (.6); further emails with MarineMax confirming payment and procedures and status of moving the yacht to storage and further emails with R. Landy regarding same (.1); telephone call from and emails with contractor for the development of the Indiana properties regarding status of same and payment for the permit, emails with my counsel regarding same, and receive update from A. Pavon regarding her call with contractor (.3); emails with counsel regarding zoning for tri-plex in Gulfport and emails with property manager regarding same and contracts for future rentals and further discuss with team resolving issues (.2); further emails with borrower and A. Pavon regarding scheduling call to discuss payment to the Estate and related matters and provide further input regarding same (.2); telephone call from and emails with counsel for agent/advisor regarding his sending funds in trust account to the Estate and provide wire instructions for fiduciary account for Estate (.2); email from counsel for investors regarding proposed common interest agreement for purposes of claims against third parties, review same, and discuss with C. Perez (.3).	KDM	2.10	\$395.00		\$829.50
09/24/2024	[Case Administration]: Emails with investors regarding the receivership and enforcement	KDM	0.40	\$395.00	-	\$158.00

action, communications with other investors, the secure portal to upload information and documents related to investment, and related matters (.2); review emails between C. Perez and other investors and discuss with C. Perez same and her communications with various investors and status of their uploads to secure portal (.2).

09/24/2024

[Asset Disposition]: Emails and discuss with C. Perez upcoming Zoom call with potential realtor for the sale of the Mexican condo unit (.1); email from C. Perez forwarding draft listing agreement with potential realtor and review same in advance of Zoom call (.2); attend Zoom call with potential realtor to discuss the unit, market conditions, their experience, strategy for selling the unit, commission structure, and related matters, and further discuss with C. Perez (.8); email from potential realtor regarding checklist of information and documents needed for preparation of listing agreement, market analysis, and related matters, review same, discuss with C. Perez, and send email to realtor regarding same and whether property manager must be hired (.3); email from Mexican counsel regarding same and documents he will provide to realtor (.1); email from counsel for agent/advisor who transferred his interest in Mexican condo to the Estate regarding the attorney in Mexico involved in the original purchase transaction, emails with my Mexican counsel regarding same, and emails between my Mexican counsel and the attorney involved with transaction regarding the documents needed for purposes of taking control of the entity that owns condo, to preserve condo, and effect the sale (.2); further emails with A. Pavon and J. Burkhalter regarding the removal of the home theater system from one property and payment from same with funds not connected to Drive Planning or investors and receive update regarding same (.1); emails with my Georgia counsel regarding filing and recording the Notices of Lis Pendens in the appropriate jurisdictions and coordinate sending all addresses and legal descriptions and following up on same (.2); emails with Mexican counsel and manager of building in which condo unit is located regarding scheduling meeting to discuss various matters related to the unit and preserving and inspecting same, and

KDM 2.20 \$395.00 - \$869.00

	discuss with C. Perez (.2).				
09/24/2024	[Business Operation]: Emails with principal of outdoor door leasing property from Drive Planning regarding status and timing of paying rent and his engagement of counsel to respond to our demand, and emails with A. Pavon and R. Landy regarding same (.2); emails with IT vendor regarding the status and timing of completing preservation and upload of Google email account and drive to Lexbe document management platform and discuss with A. Pavon same and related matters (.2); emails with L. Scruggs regarding saving entire email database to external hard drive and related matters (.1); emails with TransPerfectLegal regarding sizes of imaged databases from 7 laptop computers retrieved from Georgia office, and proposal for e-discovery platform, review same, and emails with team regarding same (.2).	KDM	0.70	\$395.00	- \$276.50
09/24/2024	[Asset Disposition]: Research into with realtors in Fischer, IN (.2); telephone call and email exchanges with Adam of Allies Commercial Realty (.3); telephone call with J. Cummings of Remax to discuss listing property (.2); email exchanges and telephone call with S. Armstrong to discuss listing property (.3); telephone conference with Jason Schnurr and Gary Mills to discuss build out of property (.5); telephone call with K. Dicks regarding Fischer, IN property and sale of same (.2).	АР	1.70	\$250.00	- \$425.00
09/24/2024	[Business Operation]: Email exchange with J. Burkhalter providing instruction to open up new account (.1); text exchange with J. Burkhalter regarding sale of furniture (.1); review of public records, zoning map, and telephone call with the City of Holmes Beach, Florida to determine if AirBNBs are permitted (.5); email exchange with Jason of Southern Home Stay to discuss cancellation of contracts due to zoning ordinance (.1).	АР	0.80	\$250.00	- \$200.00
09/25/2024	[Asset Disposition]: Work to gather documents for corporate ownership and ownership interest of property in Cabo San Lucas for preparation of listing agreement (1.2); work to coordinate access to and inspection with counsel and realtor in Mexico and coordination with property manager and exchange various emails regarding same (2.0).	СРМ	3.20	\$375.00	- \$1,200.00

09/25/2024	[Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez discussing insurability of properties under impending storm.	MJK	0.20	\$225.00	25.0%	\$33.75
09/25/2024	[Business Operation]: Continue to gather signed agreements from DocuSign account related to Mary Cagle for attorney review.	jas	3.70	\$100.00	25.0%	\$277.50
09/25/2024	[Asset Analysis and Recovery]: Receipt and review of Fannin County property taxes to determine deadlines for payment and provide instruction to J. Serna regarding same.	АР	0.10	\$250.00	-	\$25.00
09/25/2024	[Case Administration]: Respond to investor inquiries regarding case status and data upload by telephone and email.	СРМ	1.60	\$375.00	-	\$600.00
09/25/2024	[Asset Analysis and Recovery]: Telephone calls regarding property management and storm preparation issues for St. Petersburg properties.	СРМ	2.30	\$375.00	-	\$862.50
09/25/2024	[Asset Disposition]: Emails with MarineMax regarding the proposed sale of the yacht and related issues and discuss with team (.2); emails with Florida realtor regarding certain individuals who had approached us about purchasing certain properties and the appropriate commission rate for a possible sale to those individuals and discuss with C. Perez (.2); emails with manager of building in which condo unit in Mexico is located regarding arranging for access to unit and addressing other issues including turning on power and payments for same and other maintenance items and discuss with team (.2); emails with Mexican counsel regarding same (.1); emails with Florida realtor regarding keys for one condo unit in St. Petersburg and timing of accessing same and discuss with team (.1); emails with counsel for Burkhalter regarding documents still needed for legal entity that owns Mexican condo unit for purposes of sale and related matters and discuss with my counsel (.2); emails with counsel for Burkhalter regarding communications with occupant of house in St. Petersburg, access to that house, potential purchaser for multi-family property, and sale of vehicle and discuss with team (.2).	KDM	1.20	\$395.00		\$474.00
09/25/2024	[Asset Analysis and Recovery]: Further communications with Bliss condo association regarding payment of monthly	KDM	1.80	\$395.00	-	\$711.00

09/25/2024	association dues for Defendant's unit and emails with team regarding same (.1); emails with bank regarding additional time to provide certain documents in response to Subpoena, emails with team regarding same, and coordinate requesting confirmation of date of production of other categories of documents (.2); review further emails with bank regarding same (.1); continue working with team on confirming and/or obtaining insurance coverage for certain Florida properties, following up with insurance agent regarding status of applications and binding of policies, and contacting buildings and condo associations to discuss coverage and related matters (.5); review emails with A. Pavon and condo association for one building regarding insurance and securing the property and further discuss with team (.2); discuss with A. Pavon the status of responses and productions pursuant to all Subpoenas issued to date and provide direction regarding additional subpoenas to send to various third parties, and strategize regarding same (.4); emails with A. Pavon regarding confirmation that all property taxes for all properties in Fannin County have been paid and the deadline to make the next tax payment, review various documents regarding same, and provide direction regarding future payments (.3).	KDM	0.20	\$395.00		\$79.00
03/23/2024	and L. Scruggs regarding the status of his preserving and saving entire Google email and Google drive accounts and uploading them to document management platform and emails with L. Scruggs regarding ability to save all data to external hard drive (.2).	NOW	0.20	φ335.00		ψ13.00
09/25/2024	[Case Administration]: Emails and telephone calls with City National Bank regarding setting up online treasury management for accounts to facilitate initiation of transfers out of account and emails and discuss with M. Dhanji.	KDM	0.30	\$395.00	-	\$118.50
09/25/2024	[Case Administration]: Receipt and review of mail for Drive Planning and discussion with K. Murena regarding same (.3); continued drafting of initial Status Report (.8).	АР	1.10	\$250.00	-	\$275.00
09/26/2024	[Asset Analysis and Recovery]: Email exchange with counsel for Truist Bank to obtain production (.1); email exchange with	AP	3.50	\$250.00	-	\$875.00

(.1); email exchange with South State Bank regarding unfreezing of funds and new account (.1); email exchange with K. Murena requesting instruction on paying insurance in the name of J. Burkhalter and T. Burkhalter (.1); telephone call with JP Morgan Chase requesting status of subpoena responses and extension provided and email exchange with Receiver regarding same (.4); receipt and brief review of Truist first production (.3); multiple telephone calls and email exchanges with Burg Management regarding 17670 Front Beach to determine flood and hurricane insurance of building (1.0); receipt and brief review of flood and hurricane insurance of bridging (1.0); receipt and brief review of flood and hurricane insurance for 17670 Front Beach (.1); telephone call with Chase Subpoena center to obtain status on production of documents (.2); continued review of invoices pertaining to installation and delivery of furnishings for Georgia properties, prepare summary to K. Murena and recommend payment of same (.1); email exchange with American Express to discuss overdue subpoena (.1); review of property records of 337 Wash Wilson, 274 Madola Road, and 315 Wash Wilson, 274 Madola Road, and 315 Wash Wilson Road to determine transfer of ownership documents and e-mail exchange with G. Mills regarding same (.4); email exchanges with M. Haye coordinating phone call and providing instruction to J. Serna regarding same (.1).
09/26/2024 [Business Operation]: Continue to work on jas 1.90 \$100.00 25.0% \$142. signed agreements from DocuSign account related to Mary Cagle.
09/26/2024 [Case Administration]: Respond to investor, CPM 3.60 \$375.00 - \$1,350. inquiries by email and telephone, and assist with upload of investor documentation.
09/26/2024 [Asset Analysis and Recovery]: Prepare jas 0.40 \$100.00 25.0% \$30. Notice of lis pendens with notary requirement for purposes of recording in the Southern District of Indiana.
09/26/2024 [Asset Disposition]: Emails and discuss with KDM 0.80 \$395.00 - \$316. A. Pavon issues related to home theater

system in house in Georgia, the seller's lien on the property for non-payment, investigating same, and determining whether to seek the return of same or sell it with house, and provide direction regarding same (.2); coordinate sending emails to counsel for Defendant and to counsel for Relief Defendants regarding the proposed listing for sale of all of the properties titled in their names and payment of insurance premiums for same (.2); emails and discuss with A. Pavon the furniture in storage to be delivered to and assembled in properties Georgia and Florida, receive confirmation of purchaser of furniture and owners of the properties, and coordinate delivery, assembly, and payment of invoices for same (.2); emails with counsel for Defendant regarding corporate formation documents for the entity that owns the Mexican condo unit, discuss with C. Perez, and send email to counsel for J. Edwards regarding same (.2).

09/26/2024

[Asset Analysis and Recovery]: Emails with A. Pavon regarding payment of insurance premiums for properties in names of Defendant and J. Burkhalter, coordinate sending email to their counsel regarding same and confirming consent to sale of properties, and related matters, and further discuss with A. Pavon (.3); emails with insurance agent regarding payment instructions for insurance premiums, discuss with A. Pavon, follow up on status and timing of payment by J. Burkhalter, and further emails with J. Burkhalter regarding same, send premium invoice and policy information to J. Burkhalter, and request further information from insurance agent (.3); emails with A. Pavon regarding having J. Burkhalter make mortgage payment for TBR Supply House from unfrozen account at SouthState Bank, emails with J. Burkhalter regarding same, and email from SouthState Bank regarding wire transfer to lender (.2); emails with condo association for the Panama city unit and A. Pavon regarding the insurance policies for the building and review same (.2); emails and discuss with A. Pavon regarding insurance policy for the interior of the condo unit and receive updates regarding same (.2); work with J. Serna on resolving issue related to recording of Notice of Lis Pendens in one jurisdiction (.3); emails with my counsel regarding scheduling call with agent/advisor KDM 2.50 \$395.00 - \$987.50

who borrowed money from Drive Planning regarding the Receiver's demand for loan payments and related matters and provide input to counsel regarding same (.2); emails with A. Pavon regarding the timing of Chase Bank's response and production pursuant to our Subpoena and updating Subpoena tracking chart and review chart (.2); emails and discuss with team regarding the status of American Express's response to our Subpoena, coordinate following up on same, and receive update regarding same (.2); emails and discuss with A. Pavon investigation of transfer to Drive Planning of ownership of three properties in Georgia being managed and for which rental payments are being made and emails with forensic accountant regarding same (.2); review Notice of Intention to Not Renew personal homeowner's insurance policy for property in Georgia, discuss with A. Pavon, and coordinate following up with insurance agent on obtaining replacement policy for property only, and emails with insurance agent regarding same (.2).

09/26/2024

[Business Operation]: Emails with A. Pavon regarding efforts to secure and preserve the ranch and property thereon including the cattle from the approaching hurricane and provide input regarding same (.2); emails with counsel for Burkhalter regarding accessing email account to obtain verification codes to access social media accounts, emails with A. Pavon regarding same, and receive updates regarding same (.2); discuss with C. Perez various tax issues related to Drive Plannings operations and payments to investors, investors' questions regarding same, the answers to frequently asked questions to post to receivership website, communications with my tax consultant regarding same, and the status of obtaining tax transcript from the IRS, and provide input regarding same (.4); discuss with A. Pavon the status of the cattle, the pregnancy of 5 cows and increase in their value, and the upcoming cattle show at which cattle will be presented, and address issues related to potential sale of cattle (.2); review Notice from Truist Bank regarding debits attempted to be made from Drive Planning account, including by ADP for taxes, discuss with A. Pavon, coordinate resolving issue with ADP, and emails with

KDM 1.50 \$395.00 - \$592.50

	M. Dhanji and A. Pavon regarding same (.3); emails with Truist Bank managers regarding same and related matters and work on resolving issue (.2).					
09/26/2024	[Case Administration]: Emails from investors providing documents regarding investment with Drive Planning, review same, and discuss with C. Perez.	KDM	0.40	\$395.00	-	\$158.00
09/26/2024	[Business Operation]: Email exchange and telephone call with Jason of Southern Homestay following up on cancelling contracts (.3); review of Southern Homestay contract (.2); email exchange with Jason from Southern Homestay regarding Airbnb zoning issue (.1); continued review of zoning in Gulfport properties to provide recommendation to Receiver on continuing Airbnb service (.2); telephone call with ADP regarding updating bank account and taxes coming from previous account (.1).	АР	0.90	\$250.00	-	\$225.00
09/26/2024	[Asset Disposition]: Telephone call and multiple email exchanges with F. Krawczyk to discuss Fisher, Indiana properties and listing of same (.6); telephone call with G. Mills to discuss furniture delivery (.1).	АР	0.70	\$250.00	-	\$175.00
09/26/2024	[Business Operation]: Emails with A. Pavon and SouthState Bank confirming unfreezing of account for ranch, store, and barn, coordinate having J. Burkhalter pay insurance premiums for barn and other properties from that account, and emails with J. Burkhalter regarding same.	KDM	0.20	\$395.00	-	\$79.00
09/26/2024	[Asset Analysis and Recovery]: Email exchange with homeowner's association for Panama City property to determine hurricane procedures (.1); email exchange with J. Burkhalter providing instruction on making mortgage payment (.1).	АР	0.20	\$250.00	-	\$50.00
09/26/2024	[Asset Disposition]: Telephone call with K. Murena regarding outstanding insurance invoices, furniture invoices, and selling of properties not owned by Drive Planning.	AP	0.30	\$250.00	-	\$75.00
09/27/2024	[Asset Analysis and Recovery]: Legal research for purposes of determining employee dishonesty coverage under Indiana insurance law.	MJK	3.00	\$225.00	25.0%	\$506.25
09/27/2024	[Case Administration]: Communication with forensic company regarding data	LS	0.50	\$275.00	25.0%	\$103.12

	extractions and sending hard drive.				
09/27/2024	[Asset Analysis and Recovery]: Email exchange with K. Murphy following up on boat insurance (.1); email exchange with C. Rodriguez of CMR Insurance to discuss new boat insurance (.1); email exchange with Otto of Avante Nea to discuss new boat insurance (.1); email exchanges and telephone call with L. Laster of Combined Insurance to discuss new boat insurance (.4); email exchange with C. Murena regarding Cabo condo unit (.1); prepare insurance application for Drive Properties, LLC and respond to questions from carrier (.2); telephone call with K. Murphy regarding unsecured insurance line options for yacht (.2); email exchange with M. Dhanji regarding insurance payments to be made (.1); continued revisions to property list to include purpose of property (.3).	AP	1.60	\$250.00	- \$400.00
09/27/2024	[Case Administration]: Emails with M. Dhanji and City National Bank regarding issue with incoming wires and related issues and follow up on resolving same (.1); further emails with M. Dhanji and the bank regarding transferring funds to operating account to cover various operating expenses of the properties and reimbursement of expenses, and discuss with M. Dhanji same and related issues (.2); discuss with A. Pavon preparation of Receiver's Initial Status Report and provide direction regarding same (.3).	KDM	0.60	\$395.00	- \$237.00
09/27/2024	[Asset Analysis and Recovery]: Emails with MarineMax regarding the damage to the marina where yacht was stored, coordinate determining whether yacht can be returned to marine from dry storage, and receive update regarding same (.2); emails with A. Pavon regarding status of obtaining insurance quote for replacement insurance for yacht given current carrier's notice of non-renewal and provide input regarding same (.2); emails with insurance agent regarding quote for insurance, review same, discuss with A. Pavon, and coordinate obtaining alternative quotes (.3); emails with J. Bowman and Florida realtor regarding the status and condition of various properties following the hurricane and discuss with team (.2); emails with insurance agent and A. Pavon regarding information needed to complete application for replacement policy for certain property	KDM	3.20	\$395.00	- \$1,264.00

in Florida and provide input regarding same (.2); emails with insurance agent and J. Burkhalter regarding payment of premium for insurance for the barn/event space (.1); emails with J. Bowman, Southern Homestay, and A. Pavon regarding accessing the tri-plex in Gulfport to assess condition and damages following hurricane and confirming the status of occupancy and cancellation of rental, and receive updates regarding same (.2); review various invoices and checks for insurance policies and taxes due for certain real properties, discuss with A. Pavon and M. Dhanji, sign checks, and coordinate sending to insurance agent and taxing authority (.3); work with team on confirming the condition of all real properties following the hurricane (.5); emails with A. Pavon and proposed realtor in Indiana regarding the design and permitting work done by contractor for certain properties in Indiana, the proposed payment for the permit, and related matters, review documents regarding the properties and provide further direction regarding same (.3); emails with SouthState Bank and J. Burkhalter confirming payment of mortgage for TBR Supply House and discuss with team (.1); emails with yacht captain and R. Landy confirming that the yacht suffered no damages from the hurricane (.1); further emails with insurance agent and A. Pavon regarding efforts to obtain insurance proposals for the yacht, the various carriers who were approached and declined to write policies, and related matters, review documents related to same, and provide input regarding the information to provide to carriers to obtain a proposal (.3); receive notice from Chase regarding attempted debits from account and coordinate investigating same (.1); emails with team regarding one bank's response to Subpoena and status of receiving link to production and coordinate following up on same (.1).

09/27/2024 [Business Operation]: Review invoices and checks for reimbursement of expenses for hurricane storage and transportation of yacht and hard drives for forensic imaging and sign checks (.1); emails with L. Scruggs regarding status of receiving

forensic images of laptops retrieved from Georgia office and copying entire Google email account and Google drive so copy KDM 0.50 \$395.00 - \$197.50

can be included on hard drive to be sent to SEC counsel and uploaded to Lexbe document management platform, and discuss with C. Perez (.2), review invoice from contractor for the installation of A/C unit and repair of door, discuss with C. Perez, emails with C. Perez and J. Bowman regarding same and related matters, and login to operating account to make payment to contractor (.2). 99/27/2024 [Asset Disposition]: Follow up with R. Landy on status of interviewing yacht broker and receive update regarding same (.1); emails with Georgia reattor and A. Pavon regarding the status of preparing certain properties to be listed for sale, including cleaning them and having furniture delivered and assembled, and further discuss with A. Pavon (.2); emails with Mexican autorney and manager of condo building regarding meeting at the unit to inspect same and the building and discuss with term (.2); emails with Mexican autorney and manager of condo building regarding meeting at the unit to inspect same and the building and discuss with term (.2); emails with Mexican realtor and Kinder of Mexican counsel, and Mexican realtor of Mexican counsel, and Mexican realtor and Mexican realtor and Mexican realtor and Mexican attorney regarding their inspection of the unit, its condition, minor issues and repairs that need to be addressed, turning power back on, and need to hier property manager to address certain of these items, and discuss with C. Perez (.3); multiple emails with Mexican realtor and review of the properties,							
on status of interviewing yacht broker and receive update regarding same (.1); emails with Georgia realtor and A. Pavon regarding the status of preparing certain properties to be listed for sale, including cleaning them and having furniture delivered and assembled, and further discuss with A. Pavon (.2); emails with Mexican attorney and manager of condo building regarding meeting at the unit to inspect same and the building and discuss with team (.2); emails with A. Pavon and C. Perez regarding various issues related to Mexican condo unti, including turning on power, addressing legal and tax issues necessary for sale of unit, assistance of Mexican counsel, and Mexican realtor's inspection and preparing unit for listing, and further discuss with C. Perez (.3); multiple emails with Mexican realtor and Mexican attorney regarding their inspection of the unit, its condition, minor issues and repairs that need to be addressed, turning power back on, and need to hire property manager to address certain of these items, and discuss with C. Perez (.3); emails with Georgia realtor and A. Pavon regarding two of the properties, the occupants and manager of the properties, and provide input regarding resolving issues (.2). 109/27/2024 [Business Operation]: Receipt and review of last purchase transactions for Staurolite Barn and Burkhalter Ranch (.3); email exchange with J. Burkhalter regarding rentals in Doc Roof Road (.1); email exchange with K. Murena regarding tenant in St. Petersburg property and possible need to evict (.1).		SEC counsel and uploaded to Lexbe document management platform, and discuss with C. Perez (.2); review invoice from contractor for the installation of A/C unit and repair of door, discuss with C. Perez, emails with C. Perez and J. Bowman regarding same and related matters, and login to operating account to					
of last purchase transactions for Staurolite Barn and Burkhalter Ranch (.3); email exchange with J. Burkhalter regarding rentals in Doc Roof Road (.1); email exchange with K. Murena regarding tenant in St. Petersburg property and possible need to evict (.1). O9/27/2024 [Asset Disposition]: Telephone call with F. Krawczyk to provide additional information on property in Fischer, Indiana (.3); email	09/27/2024	on status of interviewing yacht broker and receive update regarding same (.1); emails with Georgia realtor and A. Pavon regarding the status of preparing certain properties to be listed for sale, including cleaning them and having furniture delivered and assembled, and further discuss with A. Pavon (.2); emails with Mexican attorney and manager of condo building regarding meeting at the unit to inspect same and the building and discuss with team (.2); emails with A. Pavon and C. Perez regarding various issues related to Mexican condo unit, including turning on power, addressing legal and tax issues necessary for sale of unit, assistance of Mexican counsel, and Mexican realtor's inspection and preparing unit for listing, and further discuss with C. Perez (.3); multiple emails with Mexican realtor and Mexican attorney regarding their inspection of the unit, its condition, minor issues and repairs that need to be addressed, turning power back on, and need to hire property manager to address certain of these items, and discuss with C. Perez (.3); emails with Georgia realtor and A. Pavon regarding two of the properties, the occupants and manager of the properties, and the status of the deeds of the properties, and provide	KDM	1.30	\$395.00		\$513.50
Krawczyk to provide additional information on property in Fischer, Indiana (.3); email	09/27/2024	of last purchase transactions for Staurolite Barn and Burkhalter Ranch (.3); email exchange with J. Burkhalter regarding rentals in Doc Roof Road (.1); email exchange with K. Murena regarding tenant in St. Petersburg property and possible	АР	0.50	\$250.00	-	\$125.00
	09/27/2024	Krawczyk to provide additional information on property in Fischer, Indiana (.3); email	AP	0.90	\$250.00	-	\$225.00

of property and timeline of same (.1); email exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5)					
[Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance.	RML	0.10	\$395.00	-	\$39.50
[Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with S. Askue regarding documents from Truist (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if backup support has been provided (.3).	АР	3.70	\$250.00	-	\$925.00
[Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena.	MJK	0.50	\$225.00	25.0%	\$84.37
[Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules.	MJK	0.10	\$225.00	25.0%	\$16.87
[Case Administration]: Production preparation and document download.	LS	5.50	\$275.00	25.0%	\$1,134.37
[Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after hurricane.	СРМ	2.20	\$375.00	-	\$825.00
	exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5) [Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance. [Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if back-up support has been provided (.3). [Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena. [Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules. [Case Administration]: Production preparation and document download. [Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after	exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5) [Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance. [Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with S. Askue regarding documents from Truist (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if back-up support has been provided (.3). [Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena. [Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules. [Case Administration]: Production preparation and document download. [Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after	exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5) [Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance. [Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if back-up support has been provided (.3). [Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena. [Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules. [Case Administration]: Production LS 5.50 [Case Administration]: Production CPM 2.20 [Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after	exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5) [Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance. [Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if backup support has been provided (.3). [Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena. [Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules. [Case Administration]: Production LS 5.50 \$275.00 preparation and document download. [Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after	exchanges and telephone call with K. Dick of Bradley Co discussing proposal to list properties and findings regarding DI Build, and review of proposal (.5) [Asset Analysis and Recovery]: Review and analyze emails regarding Yacht insurance. [Asset Analysis and Recovery]: Email exchange with G. Hays regarding status of bank reconstruction and request for information for status report (.1); telephone call with K. Murena to discuss status of insurance, sale of vehicles, and payroll (.3); receipt and review of document production from Coinbase (.3); email exchange with C. Rodriguez providing information for 2021 Galeon 68 Fly to obtain insurance on same (.1); email exchange with J. Clement following up on demand for rent (.1); draft demand letter to Tampa Bay Rays requesting return of \$400,000 paid from Drive Planning (1.2); review of purposed purchase contract for St. Petersburg property to determine validity of same (.2); draft subpoena to American IRA and discuss with Receiver (1.0); receipt and review of second production from Truist to determine if backup support has been provided (.3). [Asset Analysis and Recovery]: Draft opinion position memorandum concerning provision of insurance policy and dishonesty claim and send same in correspondence to K. Murena. [Asset Analysis and Recovery]: Phone call with Chantelle Rodriguez to discuss insurance company re-opening schedules. [Case Administration]: Production preparation and document download. [Asset Analysis and Recovery]: Various calls, emails and texts messages with realtor and property manager regarding condition and access to properties in St. Petersburg and Panama City after

09/30/2024	[Asset Analysis and Recovery]: Analyze research for drafting litigation hold notices and document preservation demands for drafting letter to send to brokers and financial advisors.	KP	0.90	\$375.00	- \$337.50
09/30/2024	[Asset Analysis and Recovery]: Begin drafting template document preservation demand letter to send to brokers and financial advisors.	KP	0.50	\$375.00	- \$187.50
09/30/2024	[Asset Analysis and Recovery]: Continue working with team on confirming status and condition of all real properties following the hurricane (.4); emails and discuss with A. Pavon status of binding insurance policies on certain properties and the inspections required for same (.2); emails and discuss with A. Pavon the status of communications with occupant of one house in St. Petersburg and emails and telephone to occupant regard the property, the Estate's interest in same, her intentions regarding vacating the property and paying amounts to the Estate, and related matters (.2); emails with insurance agent regarding issues with obtaining insurance proposals for the yacht, carriers she approached, and related matters, and discuss with A. Pavon obtaining proposal from other insurance agents and carriers (.2); prepare and send email to one insurance agent and telephone call to insurance company requesting proposal for insurance policy for the yacht and discuss with A. Pavon same and following up on proposals (.3); emails with borrower regarding scheduling call to discuss note and payments to the Estate thereunder, discuss with A. Pavon, and coordinate scheduling call (.2); discuss with A. Pavon issues related to two properties in Georgia, recommendation from Georgia realtor regarding resolution of issues, documents needed regarding the sale to Relief Defendant, and contacting J. Burkhalter and the seller regarding same (.2); email from M. Koch providing analysis regarding filing employee dishonesty claim against Drive Planning's business policy, emails with A. Pavon regarding same, and strategize regarding same (.3); emails with contractor regarding same (.3); emails with contractor regarding same, and discuss with A. Pavon same, issues related to permitting and deadline to pay for same, input from	KDM	4.60	\$395.00	- \$1,817.00

Georgia realtor regarding whether to proceed with work during marketing of property for sale, and related matters, and provide input regarding same (.3); discuss with A. Pavon her call with J. Burkhalter and ranch manager regarding the condition of the various properties and assets following the hurricane, the cleanup work being done, the home theater system issue. the sale of the Porsche, and related matters and provide input regarding resolving certain issues, and communications with J. Burkhalter's counsel regarding same (.2); emails with counsel for advisor regarding the amount and timing of transfer to the Estate of funds in his trust account, receive confirmation of receipt of funds, and discuss with M. Dhanji same and noting same in reconciliation of fiduciary accounts (.2): discuss with R. Landv issues related to the yacht, storage of same, and obtaining replacement insurance policy (.1); review and revise email to counsel for Burkhalter and counsel for Relief Defendants regarding listing the real properties for sale through realtors in Florida and Georgia, proposed accounting for same, need to obtain court approval for each sale, and requesting approval of same, and review list of properties, review emails to counsel regarding same, and further discuss with team (.4); email from forensic account providing analysis regarding transfers from Drive Planning to the various agents/ advisors and related matters and further work necessary to confirm all amounts through ADP and tax records, review summary reports, discuss with C. Perez, strategize regarding same, and send email to forensic accountant and my counsel regarding same and litigation hold letters to be sent (.4); emails with K. Pearson and C. Perez regarding potential claims against third parties and applicable case law. review same, and strategize regarding same and related matters (.3); emails with K. Pearson regarding status of preparation of litigation hold letters (.1); email from proposed property manager for the Mexican condo unit, emails with Mexican counsel regarding his engagement of manager to address various matters related to the unit, emails with Mexican realtor regarding same, turning on electric, and other immediate issues to address, and discuss with C. Perez (.3); email from G.

Hays regarding status of communications with manager of outdoor store occupying property of Estate and visiting manager to discuss status of rental payments, discuss with A. Pavon same, her communications with manager regarding his retention of counsel, and following up on same, review further email to manager, and emails with A. Pavon and G. Hays regarding same and approving visit to the store to discuss rent payments and related matters with manager (.3).

09/30/2024

[Asset Disposition]: Emails and discuss with A. Pavon the strategy for selling the pickup truck and Aston Martin, additional information needed for both vehicles, coordinate notifying J. Burkhalter regarding sale of truck, and send email to counsel for Burkhalter requesting documentation and information regarding Aston Martin require for sale (.3); discuss with A. Pavon the status of confirming with counsel for Burkhalter and counsel for Relief Defendants the real properties we intend to market for sale and related matters (.1): discuss with A. Pavon her discussions with potential realtors for property in Indiana, their agreement to reduce commission rates, and recommendations for the marketing of the property and development of same, and coordinate scheduling Zoom call with realtors (.2); discuss with A. Pavon intention of J. Burkhalter to sell her Porsche and remit sale proceeds to Estate (.1); discuss with R. Landv his recent communications with potential yacht brokers for purposes of sale of yacht and provide further input regarding same (.1); emails with Florida realtor and Southern Homestay regarding upcoming meeting at Gulfport tri-plex to confirm information and take pictures for purposes of listing for sale, further emails regarding unavailability of one unit based on occupancy, discuss with C. Perez same, the need to cancel all rentals and set deadline for occupant to vacate the property, her call with realtor regarding same and cancellation of visit and photographer, and related matters, and review email from C. Perez to Southern Homestay regarding same (.4).

KDM 1.20 \$395.00 - \$474.00

09/30/2024

[Business Operation]: Emails with J. Bowman regarding transfer between operating accounts to resolve ADP tax payment issue and updating the accounting KDM 0.70 \$395.00

\$276.50

	to note purpose of transfer and discuss with C. Perez and A. Pavon (.2); receive update from A. Pavon regarding status of addressing ADP tax payment issue (.1); emails and telephone call with Truist Bank regarding investigating certain service charges debited account and transferring account balances in that and other account to account for Florida properties and closing accounts and discuss with team (.2); discuss with C. Perez regarding the status and condition of certain Florida properties, her communications with J. Bowman regarding same and issues with another A/C unit, and related issues (.2).					
09/30/2024	[Case Administration]: Emails with Chase regarding issues with Drive Planning account and information needed to keep account active and emails and discuss with team (.2); emails with City National Bank regarding the fiduciary accounts, transfers between accounts, access to accounts online, and related matters, and discuss with M. Dhanji same and transferring funds to operating accounts to cover payments to maintain and insure properties (.2); emails with IT vendor and L. Scruggs regarding the status of forensically capturing entire email account and Google drive account and uploading to document management platform and preparation of hard drive with all documents to send to SEC counsel and further discuss with team (.2); review invoice from IT vendor for work performed, and emails with team regarding payment of same (.1); emails with A. Pavon regarding status of downloading all documents from DocuSign account (.1).	KDM	0.80	\$395.00	-	\$316.00
09/30/2024	[Business Operation]: Email exchange with ADP to follow-up on account change (.1); weekly video conference with J. Burkhalter and staff regarding TBR Supply House, Staurolite Barn, and Burkhalter Ranch and subsequent call with J. Burkhalter regarding outstanding payments (1.1).	АР	1.20	\$250.00	-	\$300.00
09/30/2024	[Asset Disposition]: Email exchanges with counsels for J. Burkhalter and T. Burkhalter to discuss sale of property.	AP	0.20	\$250.00	-	\$50.00
09/30/2024	[Case Administration]: Review of Julie Edward's e-mail to determine feasibility of downloading all Truist wire confirmations.	AP	0.10	\$250.00	-	\$25.00
09/30/2024	[Asset Analysis and Recovery]: Email	AP	0.10	\$250.00	-	\$25.00

exchange with G. Hays regarding Outdoor Supply House and visit to same to discuss rent, distributions to estate, and financials.

Hours Subtotal

983.9

Discount on Fees

-\$10,303.29

Fees Subtotal

\$307,258.21

Expenses

Туре	Date	Description	Quantity	Rate	Amount
Expense	08/05/2024	Clerk of Court, Certified copies of Notices of Lis Pendens in MDFL. 09.10.24	1.00	\$26.00	\$26.00
Expense	08/14/2024	Corporate registered agent Amendment for Drive Planning LLC	1.00	\$20.00	\$20.00
Expense	08/14/2024	U.S District Clerk for the Northern District of Georgia. Certified copies of Appointment Order. 08.14.24	1.00	\$245.00	\$245.00
Expense	08/15/2024	Fedex: Invoice 08528. J.P Morgan Chase Bank. CT Corporation System. 08.15.28	1.00	\$24.16	\$24.16
Expense	08/15/2024	Fedex: Invoice 08528. American Express, Compliance Dept. 08.15.24	1.00	\$43.24	\$43.24
Expense	08/15/2024	Fedex: Invoice 08528. Truist Bank, Subpoena Operations Office. 08.15.24	1.00	\$29.36	\$29.36
Expense	08/15/2024	Fedex: Invoice 08528. U.S Courthouse, Clerk of Court, Atlanta. 08.15.24	1.00	\$36.02	\$36.02
Expense	08/16/2024	U.S. District Clerk. Filing Fee for Miscellaneous actions in Southern District Indiana.08.16.24	1.00	\$52.00	\$52.00
Expense	08/16/2024	U.S. District Clerk. Filing fee for miscellaneous actions in District of Hawaii. 08.16.24	1.00	\$52.00	\$52.00
Expense	08/16/2024	U.S. District Clerk. Filing fee for miscellaneous actions in Middle District FL.	1.00	\$52.00	\$52.00
Expense	08/16/2024	Filing fee for miscellaneous actions in Norther District of Florida.	1.00	\$52.00	\$52.00
Expense	08/18/2024	Travel expense. St. Petersburg. RML. 08.18.24	1.00	\$49.47	\$49.47
Expense	08/19/2024	Fedex: Invoice 52264. US District Court - Hawaii. 08.19.24	1.00	\$50.24	\$50.24
Expense	08/19/2024	Fedex: Invoice 52264. US District Court Middle. Tampa. 08.19.24	1.00	\$30.63	\$30.63
Expense	08/19/2024	Fedex: Invoice 52264. US District Court, Clerk of Courts, Indianapolis. 08.19.24	1.00	\$41.16	\$41.16

Expense	08/19/2024	Fedex: Invoice 52264. J.P Morgan Chase, Mail Code LA 4-7200. 08.19.24	1.00	\$40.36	\$40.36
Expense	08/19/2024	Fedex: Invoice 52264. U.S Courthouse, Clerk of Court, Atlanta. 08.19.24	1.00	\$47.82	\$47.82
Expense	08/19/2024	Travel Expense, St. Petersburg - KDM.08.19.24	1.00	\$168.89	\$168.89
Expense	08/19/2024	Travel expense. Hotel St. Petersburg- KDM. 08.19.24	1.00	\$168.89	\$168.89
Expense	08/19/2024	Travel expense. Hotel St. Petersburg- RML. 08.19.24	1.00	\$213.83	\$213.83
Expense	08/20/2024	Fedex: Invoice 52264. NetJets Sales, Inc. 08.20.24	1.00	\$40.36	\$40.36
Expense	08/20/2024	Travel expense. St. Petersburg. RML.08.20.19	1.00	\$46.33	\$46.33
Expense	08/21/2024	E-Binder Recorded in public records. Appointment Order. Florida Bay. 08.21.24	1.00	\$214.00	\$214.00
Expense	08/21/2024	E-Binder Recorded in public Records. Appointment Order. Florida/Pinellas. 08.21.24	1.00	\$228.00	\$228.00
Expense	08/21/2024	E-Binder Recorded in public documents. Appointment Order. Manatee, Florida. 08.21.24	1.00	\$228.00	\$228.00
Expense	08/22/2024	Clerk of Superior Court. Recording Fee in Fulton County.	1.00	\$25.00	\$25.00
Expense	08/22/2024	Hamilton County Recorder. Recording fee in Hamilton County. 08.22.24	1.00	\$25.00	\$25.00
Expense	08/22/2024	Boreau of Conveyances. Recording fees in Honolulu County, HI. 08.22.24	1.00	\$41.00	\$41.00
Expense	08/22/2024	Fedex: Invoice 52264. Middle District of Georgia. 08.22.24	1.00	\$37.57	\$37.57
Expense	08/22/2024	Fedex: Invoice 52264. Northern District of Indiana. 08.22.24	1.00	\$41.16	\$41.16
Expense	08/22/2024	Fedex: Invoice 52264. Northern District of California. 08.22.24	1.00	\$51.75	\$51.75
Expense	08/22/2024	Fedex: Invoice 52264. Eastern District of California. 08.22.24	1.00	\$47.18	\$47.18
Expense	08/22/2024	Fedex: Invoice 52264. Central District of California. 08.22.24	1.00	\$47.18	\$47.18
Expense	08/22/2024	Fedex: Invoice 52264. Southern District of California. 08.22.24	1.00	\$47.18	\$47.18
Expense	08/22/2024	Fedex: Invoice 52264. District of New Jersey. 08.22.24	1.00	\$41.16	\$41.16
Expense	08/22/2024	Fedex: Invoice 52264. Northern District of Illinois. 08.22.24	1.00	\$45.73	\$45.73
Expense	08/22/2024	Fedex: Invoice 52264. U.S. District Court. US Clerk,	1.00	\$42.40	\$42.40

		Birmingham. 08.22.24			
Expense	08/22/2024	Fedex: Invoice 52264. US Courthouse, Central District of Illinois. 08.22.24	1.00	\$41.16	\$41.16
Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court MD AL. Montgomery. 08.22.24	1.00	\$39.61	\$39.61
Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court SD SL. Mobile AL. 08.22.24	1.00	\$39.61	\$39.61
Expense	08/22/2024	Fedex: Invoice 52264. Southern District of Illinois. 08.22.24	1.00	\$45.73	\$45.73
Expense	08/22/2024	Fedex: Invoice 52264. US District Court ND WV, Wheeling. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. District of South Carolina.08.22.24	1.00	\$37.57	\$37.57
Expense	08/22/2024	Fedex: Invoice 52264. US District Court SD WV, Charleston. 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. Northern District of Texas. 08.22.24	1.00	\$41.16	\$41.16
Expense	08/22/2024	Fedex: Invoice 52264. US District Court ED LA, New Orleans.	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. Southern District of Texas, 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. Eastern District of Texas. 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court MDLA, baton Rouge. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Court WD LA, Shreveport. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Court NDNY. 08.22.24	1.00	\$43.26	\$43.26
Expense	08/22/2024	Fedex: Invoice 52264. District of Colorado. 08.22.24	1.00	\$45.12	\$45.12
Expense	08/22/2024	Fedex: Invoice 52264. US District Court -EDNY. 08.22.24	1.00	\$43.26	\$43.26
Expense	08/22/2024	Fedex: Invoice 52264. Eastern District of Kentucky. 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. U.S. District Courthouse SDNY. 08.22.24	1.00	\$47.83	\$47.83
Expense	08/22/2024	Fedex: Invoice 52264. U.S. District Courthouse. WDNY. Buffalo. 08.22.24	1.00	\$43.26	\$43.26

Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court - EDNC, Raleigh. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. Western District of Kentucky. 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court MDNC, Greensboro. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Court WDNC, Charlotte. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. District Court of Massachusetts. 08.22.24	1.00	\$47.83	\$47.83
Expense	08/22/2024	Fedex: Invoice 52264. U.S District Court Arizona. 08.22.24	1.00	\$50.25	\$50.25
Expense	08/22/2024	Fedex: Invoice 52264. U.S. District Court MDTN, Nashville. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Courthouse ED-MI, Detroit. 08.22.24	1.00	\$43.26	\$43.26
Expense	08/22/2024	Fedex: Invoice 52264. US District Court EDTN, Knoxville. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Court -WDTN, Memphis. 08.22.24	1.00	\$42.40	\$42.40
Expense	08/22/2024	Fedex: Invoice 52264. US District Court WD MI, Grand Rapids. 08.22.24	1.00	\$43.26	\$43.26
Expense	08/22/2024	Postage	1.00	\$10.36	\$10.36
Expense	08/22/2024	Postage	1.00	\$7.42	\$7.42
Expense	08/22/2024	Fedex: Invoice 06454. Southern District of Georgia. Tomochini United States Court. 08.22.24	1.00	\$60.07	\$60.07
Expense	08/22/2024	Fedex: Invoice 06454. District of Maryland. Edward A. Garmatz Federal Building. 08.22.24	1.00	\$40.36	\$40.36
Expense	08/22/2024	Fedex: Invoice 06454. Western District of Texas. John Wood U.S Courthouse. 08.22.24	1.00	\$63.66	\$63.66
Expense	08/23/2024	Filing fee: Middle District of Georgia.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of Georgia.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of Indiana.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of Indiana.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of California.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of California.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Central District of California.	1.00	\$52.00	\$52.00

Expense	08/23/2024	Filing fee: Southern District of California.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of New Jersey.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of Arizona.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of Alabama.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Middle District of Alabama.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of Alabama.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northen District of Illinois.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Central District of Illinois.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of Illinois.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of Maryland.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of South Carolina.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of Texas.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of Texas.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of Texas.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Western District of Texas.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of Colorado.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of Kentucky.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Western District of Kentucky.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: District of Massachusetts.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of North Carolina.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Middle District of North Carolina.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Western District of North Carolina.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of New York.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of New York.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Southern District of New York.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Western District of New York.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of Louisiana.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Middle District of Louisiana.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Western District of Louisiana.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Northern District of West Virginia.	1.00	\$52.00	\$52.00

Expense	08/23/2024	Filing fee: Southern District of West Virginia.	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filling fee: Middle District of Tennessee. 08.23.24	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filling fee. Western District of Tennessee. 08.23.24	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filing fee: Eastern District of Tennessee. 08.23.24	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filling fee: Western District of Michigan. 08.23.24	1.00	\$52.00	\$52.00
Expense	08/23/2024	Filling fee: Eastern District of Michigan. 08.23.24	1.00	\$52.00	\$52.00
Expense	08/23/2024	Fedex: RE Recording (Fulton County) Clerk of Courts. Atlanta. 08.23.24	1.00	\$37.57	\$37.57
Expense	08/23/2024	Fedex: Invoice 06454. Hamilton County Recorder. 08.23.24	1.00	\$41.16	\$41.16
Expense	08/23/2024	Fedex: Invoice 06454. Haley Robertson USDC Middle Alabama. 08.23.24	1.00	\$37.57	\$37.57
Expense	08/27/2024	Fedex: Invoice 06454. Coinbase Corporation Service Company. 08.27.24	1.00	\$36.02	\$36.02
Expense	08/27/2024	Fedex: Invoice 06454. Hamilton County Recorder, Noblesville, IN. 08.27.24	1.00	\$45.10	\$45.10
Expense	08/28/2024	Fedex: Invoice 06454. RE Recording (Fulton County) Clerk of Courts, Atlanta. 08.28.24	1.00	\$41.65	\$41.65
Expense	08/29/2024	DLE Process Servers. Invoice 2024055378. Subpoena to be served on JP Morgan Chase Bank N.A c/o CT Corporation System. 08.29.24	1.00	\$35.00	\$35.00
Expense	08/30/2024	DLE Process Servers. Invoice 2024055379. Subpoena to be served on Truist Bank Subpoena Operations Office. Additional address. 08.30.24	1.00	\$120.00	\$120.00
Expense	08/31/2024	Accurint Research Fee	1.00	\$169.38	\$169.38
Expense	08/31/2024	Pacer/Court Documents	1.00	\$191.60	\$191.60
Expense	08/31/2024	Webmaster. Purchase domain for Drive Planning, Set up home page, Post contact information, disclosures Finish building out all pages for Receivership website. 08.31.24	1.00	\$378.15	\$378.15
Expense	09/05/2024	Fedex: Invoice 65613. Julie Bowman. Remax Metro. 09.05.24	1.00	\$30.19	\$30.19
Expense	09/05/2024	DLE Process Server. Invoice 2024055381. Subpoena to be served on American Express Subpoena Response Unit. additional address. 09.05.24	1.00	\$250.00	\$250.00
Expense	09/06/2024	Fedex: Invoice 11434. Clerk Recording, Clerk of Superior Court. 09.06.24	1.00	\$31.27	\$31.27
Expense	09/09/2024	Fedex: Invoice 11434. Clerk of District Court, Northern	1.00	\$49.92	\$49.92

		District of California. 09.09.24			
Expense	09/10/2024	Fidlar Technologies. Research real estate properties. 09.10.24	1.00	\$9.75	\$9.75
Expense	09/10/2024	Fedex: Invoice 11434. Clerk of Court. U.S. District Court Indianapolis. 09.10.24	1.00	\$39.55	\$39.55
Expense	09/10/2024	Fedex: Invoice 65613. Takia Anderdson. Southern District of Georgia. 08.30.24	1.00	\$23.42	\$23.42
Expense	09/11/2024	City National Bank Checks	1.00	\$158.24	\$158.24
Expense	09/12/2024	Postage	1.00	\$5.74	\$5.74
Expense	09/13/2024	Clerk of District Court, Certified Copy of Notices of Lis Pendens in SDIN. 09.13.24	1.00	\$13.00	\$13.00
Expense	09/13/2024	Check Marion County Recorder. Recorded Copy of Notices of Lis Pendens in SDIN. 09.13.24	1.00	\$35.00	\$35.00
Expense	09/13/2024	Fedex: Invoice 64228. Clerk of the District Court SDIN. 09.13.24	1.00	\$39.55	\$39.55
Expense	09/13/2024	Fedex: Invoice 64228. Clerk of District Court MDFL. 09.13.24	1.00	\$29.42	\$29.42
Expense	09/13/2024	Postage	1.00	\$11.82	\$11.82
Expense	09/16/2024	Recorded Bradford Condo- Quitclaim Deed Document in Pubic Records. Pinellas, Florida. 09.16.24	1.00	\$29.20	\$29.20
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$41.50	\$41.50
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$47.18	\$47.18
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$28.41	\$28.41
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$40.41	\$40.41
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$37.71	\$37.71
Expense	09/17/2024	Fedex: Invoice 64228. Return voided check to potential investor. 09.17.24	1.00	\$27.54	\$27.54
Expense	09/18/2024	Postage	3.00	\$0.69	\$2.07
Expense	09/18/2024	Postage	1.00	\$0.97	\$0.97
Expense	09/19/2024	Fedex: Invoice 64228. Jon Clement TBR Outdoors. 09.19.24	1.00	\$46.23	\$46.23
Expense	09/19/2024	Fedex: Invoice 64228. Clerk Recording - Clerk of	1.00	\$44.22	\$44.22

		Superior Court, Blue Ridge, GA. 09.19.24			
Expense	09/20/2024	BeenVerified Inc Research fee	1.00	\$22.86	\$22.86
Expense	09/20/2024	Fedex: Invoice 66881. Recording Clerk. City County Building. IN. 09.20.24	1.00	\$39.38	\$39.38
Expense	09/20/2024	Fedex: Invoice 66881. Northern District of Georgia. 09.20.24	1.00	\$58.44	\$58.44
Expense	09/23/2024	Fedex: Invoice 66881. Clerk of Court MDFL Tampa. 09.23.24	1.00	\$39.55	\$39.55
Expense	09/24/2024	Fedex: Invoice 66881. Return voided check to potential investor. 09.24.24	1.00	\$55.32	\$55.32
Expense	09/25/2024	Fedex: Invoice 66881. Recording Clerk . City County Building, Indianapolis. 09.25.24	1.00	\$45.00	\$45.00
Expense	09/26/2024	Fedex: Invoice 66881. Clerk's Office. U.S. District Court Indianapolis. 09.26.24	1.00	\$39.38	\$39.38
Expense	09/27/2024	Postage	4.00	\$0.69	\$2.76
Expense	09/30/2024	Pacer/Court Documents	1.00	\$34.10	\$34.10
Expense	09/30/2024	Accurint Research Fee for Property searches.	1.00	\$5.38	\$5.38

_		44	
Fynenses	Subtotal	\$8 933 55	

Name	Hours	Rate	Discount of Fees	Amount due
Patricia Baloyra	0.9	\$375.00	-	\$337.50
Mitchell Koch	33.9	\$225.00	-\$1,906.95	\$5,720.55
Russell Landy	58.0	\$395.00	-	\$22,910.00
Casandra Murena	221.1	\$375.00	-	\$82,912.50
Kenneth Murena	326.2	\$395.00	-	\$128,849.00
Law Clerk/ Paralegal	6.0	\$100.00	-\$600.00	\$0.00
Adriana Pavon	176.4	\$250.00	-	\$44,100.00
Kristopher Pearson	4.0	\$375.00	-	\$1,500.00
Lucretia Scruggs	74.2	\$275.00	-\$5,101.34	\$15,303.66
Lisa Fazzah-Diaz	6.1	\$100.00	-\$610.00	\$0.00
Jeannette Serna	77.1	\$100.00	-\$2,085.00	\$5,625.00
			Hours Total	002.0

Hours Total

983.9

Total

\$316,191.76

Amount Due \$316,191.76

Statement of Account

Outstanding Balance New Charges Payments Received **Total Amount Due**(\$0.00 + \$316,191.76) - (\$0.00) = **\$316,191.76**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1190	09/30/2024	\$316,191.76	\$0.00	\$316,191.76
			Outstanding Balance	\$316,191.76
			Total Amount Due	\$316,191.76

	Total Account Balance	\$0.00
Damian Valori Culmo Balance		\$0.00
Retainer Funds in Account		Balance

Please make all amounts payable to: Damian Valori Culmo

Payment is due upon receipt.